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1 Q. Pay-per-views. Do you remember appearing in one  
2 with Diamond Dallas Page or having something to do with DDP?

3 A. I can't recall, sir.

4 Q. Okay. Do you remember being involved in a video  
5 shoot involving Eric Bischoff?

6 A. Yes.

7 Q. For a pay-per-view?

8 A. Yes, sir.

9 Q. And it's your recollection you were paid a set fee  
10 for those appearances?

11 A. I was paid but I don't know what I was paid, sir.

12 Q. That's fine. 1997, do you remember getting in a  
13 fight with another wrestler at an Orlando TV taping?

14 A. I recall an altercation, sir, but not a fight,  
15 sir.

16 Q. Okay. Well, describe -- I won't get into the  
17 difference of altercation. This was with a wrestler named  
18 Alex Wright?

19 A. Yes, sir.

20 Q. And this was do you think around May 1997?

21 A. I can't remember the time frame, sir, but I do  
22 remember the incident did happen, sir.

23 Q. Okay. This was during a taping of a TV --

24 A. Yes, sir.

25 Q. Okay. And what happened?

1           A.     Practically what happened, Alex Wright was  
2     scheduled to work, wrestle twice that day. One was -- we  
3     had four tapings that day. I was on I think three out of  
4     the four tapings. He was on the second taping and then the  
5     last taping.

6                     And the last taping he had to wrestle me, and he  
7     had just got through wrestling I think like the second match  
8     and he had again the eighth match, you know, in the same  
9     tape. They were giving him a push. They were getting ready  
10    to change him over from Das Wonder Kid to Berlyn.

11                    And -- well, he was out of breath. He was kind of  
12    out of shape, you know. They kind of stayed up all night,  
13    and, you know, when the new guy what happened is you wrestle  
14    an old guy, you go up to them and say, okay, what do you  
15    want to.

16                    Well, he was out of breath. He told me, well,  
17    come back in two more matches. Well, we -- four matches and  
18    then we were out of the ring, so I don't know what's going  
19    on. I mean, I'm trying to figure out what he want to do as  
20    far as his finishes and his maneuvers and so forth.

21                    So finally I went up to him and I asked him, I  
22    said, well, Alex, we're up in the next two matches. You  
23    know, he start cussing, sucker punch me, tried to grab me  
24    because, you know, he's a shoot wrestler, too. We're both  
25    shoot wrestlers.

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1           And he tried to grab me and he tried to throw me  
2 backward. Well, he grabbed me. I was standing right behind  
3 one of the light cases, the big boxes sit up, and when he  
4 grabbed me, we both fell backwards over the case and we  
5 fell, we twist.

6           And they had like metal poles on the right, and  
7 when I fell, I fell into one of the pole. And his shoulder  
8 and arm, he knocked the skin off his shoulder and arm. I  
9 fell and hit the side of my head and split myself open,  
10 so -- but it was, you know, there were no punches thrown or  
11 nothing like that other than the fact that, you know, he  
12 tried to sucker punch me and grab me.

13           Q. Did guys pull you off each other at that point  
14 or --

15           A. Well, I actually grabbed Alex because I was up  
16 underneath control. Pee Wee I think was one of the referee,  
17 Randy Anderson and couple other wrestlers. I can't recall.

18           Anyway, I remember Pee Wee was back there and he  
19 told the time, I think it was Kevin Sullivan, the booker,  
20 what had happened. He seen, you know, Alex, you know, what  
21 he did and so forth.

22           Q. Okay. You don't know what people told -- let me  
23 see. Were you around when anybody relayed the story of what  
24 happened in the fight to anyone else at WCW?

25           A. Well, like I say, new guy really not allowed to

1 hang out in the trailers with the bookers and, you know,  
2 they had said what we see, so I don't know what --

3 Q. So you don't know what people might have said  
4 happened in the event or the fight or anything like that?

5 A. Once again, sir, like I say, I wasn't around.

6 Q. That's fine. And have you ever heard any of the  
7 bookers or anybody else say that you brag about your  
8 abilities a lot or anything like that?

9 A. Any of the bookers?

10 Q. Any of the bookers.

11 A. Jimmy Hart did.

12 Q. Jimmy thought you bragged about your abilities?

13 A. Well, he thought that actually I could be a  
14 mainstream guy on television, but I don't know how much pull  
15 he had.

16 Q. Okay.

17 A. Or I'm not even sure was he a booker or not.

18 Q. Okay. Did you ever hear any of the bookers or  
19 people like that express an opinion that they thought you  
20 bragged about your abilities or you lied about your  
21 abilities or anything like that?

22 A. That I brag about my abilities or they brag about  
23 my abilities, sir?

24 Q. No, no. I'm asking you if you ever heard any of  
25 the bookers say anything like that they believed that you

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1 bragged about your abilities or you lied about your  
2 abilities? Do you know whether they ever said anything like  
3 that?

4 A. Well, Terry Taylor did.

5 Q. He thought you overstated your abilities or --

6 A. Well, he thought I overstated my ability. He  
7 thought I was too flamboyant. He thought I was too  
8 outspoken.

9 Q. Okay. Do you know what he based that opinion on?

10 A. No, sir, I don't.

11 Q. Did you ever have anyone express the opinion to  
12 you that they didn't think you took instruction well, that  
13 you followed instructions well?

14 A. No, I didn't.

15 Q. Do you know if anybody thought that about you?

16 MR. ICHTER: I'm going to object to the extent  
17 that calls for him to speculate about what other people  
18 thought. He can tell you what they said to him. He can't  
19 tell you what they thought.

20 BY MR. PONTZ:

21 Q. Did anyone ever say to you, Mr. Norris, that they  
22 thought you didn't take instruction well?

23 A. No, sir, they didn't.

24 Q. So you don't know what people thought or didn't  
25 think about you?

1           A.    No, sir, I didn't, and probably the reason is  
2   because, once again, you know, guys, they ain't going to  
3   come up to you and tell you what they think about you. I  
4   mean, they're going to say it behind your back more than  
5   likely.

6           Q.    Now, in September of 1998, try to get a sense of  
7   when this is. I know it's hard sometimes to remember  
8   exactly when things happened. Do you recall having a  
9   conversation with Diana Myers? Do you know who Diana Myers  
10   is at WCW?

11          A.    Yes, she worked for WCW.

12          Q.    Okay. So you know who she is?

13          A.    I think she's --

14          Q.    I'm not asking you if you know what she does, but  
15   you know who she is?

16          A.    Yes, sir, I do, sir.

17          Q.    Okay. And you know she works with WCW?

18          A.    Yes, sir.

19          Q.    Do you remember having a conversation with Diana  
20   about the use of WCW's name or logo in some independent  
21   shows sometime in September of 1998?

22          A.    What I recollect, sir, is Miss Myers called me and  
23   was screaming and yelling at me over the phone.

24          Q.    What was she screaming and yelling at you about?

25          A.    Actually, she said she had -- about WCW logo, the

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1 name or using wrestlers, that's what it was, using WCW's  
2 wrestlers and logos trying to book events or something like  
3 that.

4 Q. Okay.

5 A. She was yelling about.

6 Q. Something about that?

7 A. Yeah.

8 MR. PONTZ: Let me have this marked. Hang on a  
9 second. Let me have this document marked and then I'll hand  
10 it to you.

11 (Marked Defendants' Exhibit No. 4.)

12 BY MR. PONTZ:

13 Q. This is what's been marked Defendants' Exhibit 4.  
14 This is a letter in September 1998 to you from Diana Myers.  
15 Do you remember receiving this letter from Diana Myers?

16 A. I remember receiving a letter from her, sir.

17 Q. Okay. It looks like there's a FedEx slip on the  
18 back of it.

19 A. Yes, sir.

20 Q. Do you remember receiving a letter from FedEx?

21 A. Yes, sir.

22 Q. From Miss Myers?

23 A. I remember seeing a letter from her.

24 Q. Does this appear to be it or do you remember  
25 receiving more than one letter from Miss Myers or just one?

1           A.    I can't recall. I know I got a letter from her,  
2    sir.

3           Q.    Okay. Do you remember receiving this letter at  
4    all?

5           A.    Yeah, I remember receiving a letter. Yes, sir, I  
6    remember receiving the letter from Mrs. Myers.

7           Q.    Okay. You're not sure if this is it or not?

8           A.    I don't know if this is the letter or not, but I  
9    do remember receiving a letter from her, sir.

10          Q.    That's fine.

11          A.    I can't recall the time frame.

12          Q.    No problem. But you remember having a  
13   conversation with Miss Myers about using WCW logo or  
14   wrestlers or something like that in other shows that you  
15   were trying to book?

16          A.    Yes, sir, I remember her.

17          Q.    What did she tell you about that?

18          A.    Well, like I say, I was trying to hear over the  
19   high-pitch screaming and yelling over the phone, sir. I  
20   mean, she was just going on. Whoa, whoa, wait, wait. Time  
21   out. Wait a minute. What's going on first is what I asked  
22   her. And she went on and on, so, and I explained to her,  
23   you know, who I was and what I was doing.

24          Q.    And what was it that you recall explaining to her?

25          A.    What I recall explaining? That I wasn't using WCW



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1 top wrestlers on my average show. Remember, I was  
2 wrestling -- running a wrestling company and boxing company.

3 One of the things the bookers told us was to make  
4 sure that we go out on independent and get plenty of work so  
5 we're going to be ready for television.

6 Well, to me that don't make sense if you've got a  
7 guy right here and you're doing local wrestling shows and  
8 guys -- the new guys coming in that didn't have any  
9 experience, get somebody in what you call ring time, and  
10 that's what we was doing, and the new guy wasn't on  
11 contract, so, I mean, what she was blowing up to me about, I  
12 really didn't understand at all.

13 Q. You didn't understand what she was telling you or  
14 what she was talking about?

15 A. Yeah, I understand what she was saying.

16 Q. Okay.

17 A. But it went to that level of degree, sir, is what  
18 I'm saying.

19 Q. Do you think she -- obviously you don't know what  
20 was in her head, but do you think she thought you were using  
21 WCW's name or logo? Do you think that's why she called you?

22 A. Well, I think she pretty much -- evidently someone  
23 must have went back, evidently, and say, well, yeah, this  
24 guy is booking Goldberg or whatever on the show. Evidently  
25 that's probably what she was thinking.

1 I mean, things can get pretty much twisted the  
2 wrong way by the time it get to you, and I'm pretty sure  
3 that's what she thought and why she reacted the way she  
4 probably did.

5 Q. Do you remember being at a TV taping in  
6 Gainesville a little bit after the conversation with  
7 Miss Myers and having a conversation about that conversation  
8 with Terry Taylor?

9 A. Yes, I do.

10 Q. Okay. Do you remember telling Mr. Taylor words to  
11 the effect of, where you come from, if someone talks to you  
12 like Miss Myers did, they end up dead?

13 A. I don't recall saying those statement. I recall  
14 the conversation, some of the conversation me and Mr. Terry  
15 Taylor had that day, sir.

16 Q. What was that conversation about?

17 A. I -- once again, I was explaining to him that SCWA  
18 don't sound anything like WCW. That's the name of my  
19 wrestling organization.

20 And what I explained to him was, you know, I get a  
21 call at the Power Plant and I'm coming out of the ring to  
22 get these calls, and on the other end you don't know who it  
23 is. You've just got a hysteric female going off on you and  
24 you don't know about what, and you're trying to, you know,  
25 get her to settle down, calm down so you can, you know,

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1 first of all, find out what's going on. Second of all, try  
2 to get it taken care of.

3 Q. Do you know if Mr. Taylor told anybody that you  
4 had said something about the way -- where you come from, if  
5 people talk to you like Miss Myers did, they end up dead?

6 A. I don't know if talked to anybody or not. I mean,  
7 I have no knowledge or knowing who he talked to or what he  
8 going around say, okay, then. I mean, this guy had a  
9 conversation and it didn't go well.

10 I mean, I can't remember if it was -- I can't  
11 remember if it was Gainesville or not, but Mr. Taylor, one  
12 event I know I gave him a ride home. We had a long  
13 conversation, about an hour ride home from one of the events  
14 one time, and we had a long conversation just about  
15 everything.

16 Q. Do you remember ever getting in an argument with  
17 David Penzer at a TV taping?

18 A. Well, David was one of them guys, sir, that was --  
19 he's a practical joker.

20 Q. Okay.

21 A. As far as we asked, wrestlers had to go to him to  
22 get out what you call -- it wasn't no contract. They had to  
23 go get a sheet to sign to get paid, and every time I went to  
24 this guy, he always had something nasty to say to me, you  
25 know.

1           It's a long day, because usually the guy from the  
2   Power Plant, we got there -- pretty much we were there from  
3   the time the event started till 11:00 o'clock the event over  
4   with, and the last thing we wanted to do was get out of the  
5   event at 12:00 o'clock, you know, waiting on a pay sheet.

6           Q.   Did you threaten to beat up Mr. Penzer one time  
7   when you got upset with him?

8           A.   No.

9           Q.   You don't think you did that?

10          A.   No, sir.

11          Q.   Do you know if anyone ever reported to WCW that  
12   you had threatened Mr. Penzer?

13          A.   That I threatened Mr. Penzer? I don't know, sir.

14               MR. PONTZ: Let me have the next document marked.  
15   This is 5.

16               (Marked Defendants' Exhibit No. 5.)

17   BY MR. PONTZ:

18          Q.   Take a look at document Defendants' Exhibit 5,  
19   Mr. Norris. Have you seen this before?

20          A.   It just says SCW Pro Wrestling.

21          Q.   Okay. Let me ask you, on the third page of this  
22   document, last page, is that your signature?

23          A.   Yes, sir, it is, sir.

24          Q.   Okay. And it indicates you're vice chairman?

25          A.   Yes, sir. At the time I was, sir.

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1 Q. What were you vice chairman of?

2 A. Actually, I own the company, sir.

3 Q. This is SCWA Pro Wrestling?

4 A. Yes, sir.

5 Q. When did you start that company?

6 A. I can't recall, sir.

7 Q. Is this before you came to WCW?

8 A. No, sir.

9 Q. This was after you came to WCW?

10 A. Yes, sir.

11 Q. Okay. You don't remember when, though?

12 A. No, sir, I don't have the dates.

13 Q. Okay. And would you agree with me this appears to

14 be a form submitted to some kind of arena or facility to

15 hold an event at that facility?

16 A. Yes, sir.

17 Q. Do you remember filling out forms like this at

18 some of the arenas around the country or different places to

19 hold wrestling events at those arenas?

20 A. I only can recall filling out maybe one or two of

21 these, sir.

22 Q. Okay. And you don't know if in response to your

23 filling out a form like this, someone may have called WCW

24 and asked them questions or anything, do you?

25 A. Sir, I don't see why. I mean, they can call and

1 ask questions, but from what the form says, SCWA Pro  
2 Wrestling. I can see if it says WCW or you've got Goldberg  
3 or something like that, sir.

4 Q. But you don't know if someone reported to WCW --

5 A. I don't know, sir.

6 Q. -- that you represented you were a WCW wrestler or  
7 bringing WCW talent or anything like that?

8 A. I don't see anywhere on the form they say that,  
9 sir.

10 Q. Okay. But you don't know if someone called and  
11 said --

12 A. I don't know, sir. You're right. I have no  
13 knowledge of it, sir.

14 MR. PONTZ: Okay. That's fine.

15 And let me have this marked as Defendants'  
16 Exhibit 6.

17 (Marked Defendants' Exhibit No. 6.)

18 BY MR. PONTZ:

19 Q. Take a look at Defendants' Exhibit 6, Mr. Norris.  
20 This appears to be another letter dated a couple months  
21 after the previous one we looked at for Miss Myers. Do you  
22 remember receiving this letter?

23 A. Yes, sir.

24 Q. Okay. Did you have any conversation with  
25 Miss Myers about this letter?

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1           A.    I think -- I'm not sure. I talked to her about  
2   this or was it just I talked to Mr. Terry Taylor about this.  
3   I remember talking with one of them about it, sir.

4           Q.    Someone indicate to you that they believed that  
5   you might have misrepresented your position or used the WCW  
6   name in trying to book a show?

7           A.    No, sir. What was told to me from Mr. Taylor was  
8   the fact that I shouldn't be running a wrestling show, sir,  
9   what was told to me.

10          Q.    Did he tell you why?

11          A.    No. I asked why.

12          Q.    What did he say?

13          A.    Well, basically he said, you know, why should a  
14   black man run a show? Wrestler is mainstream white.

15          Q.    When did he say that to you?

16          A.    I don't recall, sir. That's what I was told.

17          Q.    Was this in the car ride?

18          A.    Yes, it was, sir.

19          Q.    With Mr. Taylor?

20          A.    Yes, sir.

21          Q.    You don't remember when that was?

22          A.    No, sir.

23          Q.    Was there anybody else around other than you and  
24   Mr. Taylor?

25          A.    He was in the car, sir. I gave him a ride home.

1 I'm pretty sure he'll acknowledge the fact that I gave him a  
2 ride home from one of the events.

3 Q. If you'll look for me in this letter on page  
4 six -- or Defendants' 6, the first sentence says, "We have  
5 recently been informed that you have attempted to book an  
6 arena for a wrestling event by using the WCW name and  
7 intimating an affiliation between WCW, yourself, and the  
8 event."

9 A. In this form here, sir?

10 Q. The letter that I handed you, Defendants'  
11 Exhibit 6. Are you telling me you don't believe that you  
12 ever used the WCW name or --

13 A. No, sir.

14 Q. Okay. But it's possible that WCW thought that you  
15 did?

16 A. No, sir, there's no way. Not when I'm looking on  
17 the form, it says SCWA Pro Wrestlers.

18 Q. Well, isn't it possible that someone you filled  
19 out a form with called and said, hey, this guy seemed to be  
20 indicating WCW was involved?

21 A. Then we should have something in writing, sir.  
22 No, there's no way.

23 Q. Somebody might have gotten it wrong?

24 A. No way. There's no way. I'm looking at a form  
25 with SCWA all over it, all pages of it.



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1 Q. Right.

2 A. SCW, all the way down, SCWA, SCWA. I mean, I'm  
3 proud of it.

4 Q. When you tried to book these events, though, you  
5 talked to the people as well as filled out forms, right?

6 A. No, it all depends. You never know who you talk  
7 to. I mean, I can't go to every state, sir.

8 Q. Sometimes, though, you talk to them on the phone  
9 or --

10 A. Right.

11 Q. So it's possible that somebody might have  
12 misperceived what you were doing?

13 A. No, sir, there's no way.

14 Q. Did you tell them you never used the word "WCW"?

15 A. No way, sir, because anytime you book an arena,  
16 sir, things that they ask to see is, first of all, they want  
17 to see your insurance, they want to see your business  
18 license. There's no way my business license say "WCW" on  
19 it.

20 Q. I understand. I'm not saying that your business  
21 license did, but isn't it possible that during your  
22 conversations with people they perceived or maybe  
23 misperceived --

24 A. No, sir.

25 Q. -- that you were with WCW?

1 A. There's no way, sir.

2 Q. Did you tell anybody you were wrestling with WCW  
3 on your own?

4 A. If somebody asked me, I told them, because at that  
5 point in time I really wasn't too thrilled about it, I mean,  
6 getting beat up every week. That's not something you want  
7 to brag about. Oh, by the way, I get beat up every week.

8 Q. That's fine. Now, Mr. Norris, at some point  
9 you're aware that the Power Plant -- let me back up. The  
10 Power Plant location that you trained at when you first  
11 arrived at WCW, was that at Carol Drive? Is that where that  
12 was?

13 A. 1530 Carol Drive, yes, sir.

14 Q. Okay. And at some point you remember that the  
15 Power Plant location moved from Carol Drive to a facility  
16 off of Log Cabin Drive; is that correct?

17 A. Yes, sir.

18 Q. Okay. When did you first find out that that -- or  
19 first hear that the Power Plant was going to move locations;  
20 do you recall?

21 A. Well, sir, the rumor went on about a year and a  
22 half, but, you know, we just waited.

23 Q. Do you know -- do you remember when you found out  
24 it was actually going to happen?

25 A. Yes, sir. I don't really recall the date.

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1 Q. Okay. Do you remember if it was beginning of 1999  
2 or around then? Does that sound about right or you don't  
3 know?

4 A. I'm not sure, sir, at all.

5 Q. That's fine. Did you understand at that time that  
6 a lot of the individuals at the Power Plant weren't going to  
7 be able to continue coming to the Power Plant once it moved?

8 A. No, sir, that wasn't stated at all.

9 Q. Okay. Did you understand that some of the people  
10 were going to be signed to trainee contracts --

11 A. Yes, sir.

12 Q. -- once the Power Plant moved?

13 A. Yes, sir.

14 Q. And you were one of those people, right?

15 A. Yes, sir.

16 Q. Okay. Do you know who else was signed to a  
17 trainee contract at the same time?

18 A. No, not right offhand, sir, I don't.

19 Q. Do you remember anybody else who was signed to a  
20 contract at that time?

21 A. Yes, sir, I remember a couple guys.

22 Q. Who do you remember that you believe was signed to  
23 a contract at that time?

24 A. Allen Funk.

25 Q. Okay. Anybody else?

1 A. Mike Sanders.

2 Q. Okay.

3 A. I'm trying to think of his real name. His  
4 wrestling is Nino. I can't remember.

5 Q. Nino?

6 A. N-i-n-o, Nino. I can't recall his real name, sir.  
7 And Elix Skipper is the only one I can remember, sir.

8 Q. Okay. Are you aware of how much each of these  
9 individuals were paid under the contract they signed to be a  
10 trainee?

11 A. No, sir, I'm not, sir.

12 Q. Okay. Are you aware of how much anybody was paid  
13 other than yourself under a trainee contract?

14 A. No, sir. When they brung you in and talked to  
15 you, they told you that's strictly confidential. They find  
16 out you told anybody, they'll cut you loose.

17 Q. Okay. So you don't know if you made more or less  
18 than those individuals?

19 A. Well, word, you know, eventually got out, sir.  
20 You know, people would eventually talk, you know. I mean,  
21 other guys eventually talked.

22 Q. Did you find out that you made more or less than  
23 some individuals that were under trainee contracts?

24 A. Yes, sir.

25 Q. You made more than some of them?

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1 A. No, sir, I made less.

2 Q. Who did you make less than?

3 A. Everybody, sir.

4 Q. Who told you that?

5 A. Excuse me, sir?

6 Q. Who told you that?

7 A. It was just rumor, speculation, just went around,  
8 sir.

9 Q. So you don't know if that's true or not?

10 A. Excuse me, sir?

11 Q. You don't know if that's true or not?

12 A. Yes, sir, it was true.

13 Q. Okay. If the contracts showed differently, would  
14 you then -- if the contracts that these individuals signed  
15 showed differently, would you have to change your -- would  
16 you find that your rumor was wrong?

17 A. If the contract read different? Like I said  
18 earlier, sir, like guys with -- the difference, what I'm  
19 saying, sir -- I'm trying to make sure I explain myself  
20 thoroughly here.

21 Q. Please.

22 A. When I first got to the Power Plant, like I say, I  
23 was down there six months and then I started asking the  
24 question about, you know, where do I go next from here.

25 I seen guys come down there, you know, two months,

1 three months, 30 days, you know, white guys, and they get  
2 contracts just like that. And there was never no issue  
3 about, you know, well, we're going to make you wait six  
4 months, we're going to make sure you pay off the school  
5 first. That was no option for the white guys.

6 Q. Do you know who -- I'm sorry to interrupt. Do you  
7 know who made the decisions on who got contracts and who  
8 didn't?

9 A. I'm pretty sure it was somebody either higher up  
10 or, you know, the bookers. It had to be.

11 Q. But you don't know who in particular made any of  
12 those decisions?

13 A. Like I said, sir, anytime I went to one guy, they  
14 sent me to the next guy, you know. They tell me schedule a  
15 meeting and they shoot it down.

16 Q. Okay. Going back to the contract that you signed  
17 in April of 1999, and let me go ahead and make life easy  
18 here. Let me mark this as Defendants' Exhibit 7.

19 (Marked Defendants' Exhibit No. 7.)

20 BY MR. PONTZ:

21 Q. Take a look at Defendants' 7. Is this a copy of  
22 the contract you signed with WCW?

23 A. Yes, sir.

24 Q. Okay. And the last page indicates that you were  
25 paid as a trainee \$3250 a month, right?

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1 A. \$3,250, yes, sir.

2 Q. Is that your recollection of how much you were  
3 paid?

4 A. Yes, sir.

5 Q. And you don't know how much other people who were  
6 signed to trainee contracts were or weren't paid, right?

7 A. On trainees, no, sir.

8 Q. Do you know who made the decision to sign you to  
9 this contract?

10 A. No, sir.

11 Q. And was it your understanding that under this  
12 contract you were providing wrestling services to WCW as an  
13 independent contractor? Was that your understanding of  
14 things?

15 A. Yes, sir.

16 MR. ICHTER: I'm going to object to the extent  
17 that it calls for a legal conclusion.

18 BY MR. PONTZ:

19 Q. That's fine. And I take it you were happy to be  
20 signed to a contract as opposed to continuing as a  
21 non-contract wrestler?

22 A. Well, once again, sir, when they offer us a  
23 contract, it wasn't a thing we can go in and we could barter  
24 for. It's like, here you go, you sign this or else. You  
25 know, if you don't sign it, you hit the street, Jack.

1 Q. Right. You could have said no thanks, but if you  
2 wanted to continue wrestling with WCW, you had a contract  
3 now, right?

4 A. Yes, sir.

5 Q. And you don't know whether they made the same kind  
6 of offer to some of the other folks training at the Power  
7 Plant, do you?

8 A. Well, the guys, you know, pretty much said the  
9 same thing. They said like, here's your contract. It's not  
10 negotiable. If you want in, this is your ticket in.

11 Q. Some of the white guys as well as the  
12 African-American guys who were at the Power Plant at the  
13 time told you that?

14 A. No, none of the white guys tell me that at all.

15 Q. Do you know whether that was true with them or  
16 not?

17 A. I don't, sir, at all.

18 Q. Okay. That's fine. In '99, do you remember  
19 roughly your weight, what weight you were wrestling at?

20 A. I don't recall, sir.

21 Q. You think about 220, somewhere in that  
22 neighborhood?

23 A. I've never been that heavy, sir.

24 Q. Okay. So somewhere less than 220?

25 A. I had to be. I've never been over, you know, 220,



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1 sir.

2 Q. Okay. And how tall are you?

3 A. I'm five-ten-and-a-half, five-eleven, sir.

4 Q. And I assume that hasn't changed during the last  
5 five, ten years?

6 A. I hope not.

7 MR. ICHTER: Well, now, wait a minute. You've got  
8 a little more elevation there.

9 THE WITNESS: Yeah.

10 BY MR. PONTZ:

11 Q. Other than your hairstyle changing through the  
12 time, your height's been the same, right?

13 A. Yes, sir.

14 Q. Okay. Well, some people have late growth spurts  
15 or other things, but I'm just checking.

16 MR. ICHTER: Mine has all been concentrated right  
17 here. That's where my late growth spurt is.

18 BY MR. PONTZ:

19 Q. Okay. Do you remember a wrestler named Harold  
20 Hogue?

21 A. Yes, sir.

22 Q. Do you know if Mr. Hogue was signed to a contract  
23 with WCW around the same time you were?

24 A. I don't know, sir.

25 Q. You don't know what he was paid WCW?

1 A. No, sir.

2 Q. Do you remember there being a group of folks  
3 around the same time as you signed to trainee contracts?

4 A. Are you talking about trainees, sir, or other  
5 wrestlers?

6 Q. Trainees.

7 A. Yes, sir, I give you a list of names, sir.

8 Q. The ones -- those are the ones you remembered?

9 A. Yes, sir.

10 Q. Is there anybody else you remembered besides those  
11 guys?

12 A. Not right now, sir.

13 Q. Okay. And I think you told me earlier, but make  
14 sure I'm correct, you don't know how much they were paid?

15 A. Correct, sir.

16 Q. And you don't know who decided to sign them to  
17 contracts?

18 A. No, sir, I don't know, sir.

19 Q. Were you aware that there were some of the folks  
20 who had been training at the Power Plant who were not signed  
21 to contracts?

22 A. Excuse me, sir?

23 Q. Were you aware that there were some people who up  
24 until that time had been training at the Power Plant who  
25 were not signed to contracts?

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1           A.   Who were training at the Power Plant but you say  
2   they was in training or --

3           Q.   No. Do you remember -- well, let me change my  
4   question. Do you remember that after the period of time  
5   where you signed contracts --

6           A.   Yes, sir.

7           Q.   -- were there some people who had previously been  
8   at the Power Plant who stopped coming to the Power Plant?

9           A.   Yes, sir.

10          Q.   Do you know if any of them were told that because  
11   they weren't under contract, they couldn't come to the Power  
12   Plant anymore?

13          A.   Yes, sir.

14          Q.   Were there white guys as well as African-Americans  
15   who were told that; do you know?

16          A.   Yes, sir.

17          Q.   Now, from the time period that you signed the  
18   contract, and this was in April 1999, right?

19          A.   Yes, sir.

20          Q.   You remained with WCW until about October of 1999;  
21   is that right?

22          A.   Correct, sir.

23-         Q.   Okay. Do you remember how many times you wrestled  
24   at WCW events during that period?

25          A.   No, sir.

1 Q. Okay. Does about eight or ten sound about right?

2 A. I don't know, sir. I don't recall.

3 Q. Okay. That's fine. Do you remember wrestling at  
4 a pay-per-view during 1999?

5 A. A pay-per-view, sir? No, sir.

6 Q. Do you remember wrestling at a Nitro?

7 A. I don't recall, sir. I'm not sure.

8 Q. Is it possible you wrestled at a Nitro or some  
9 Nitros during '99?

10 A. I'm not sure, sir.

11 Q. That's fine. Do you remember receiving a call in  
12 October 1999 from JJ Dillon?

13 A. I don't remember, sir, at all.

14 Q. How did you find out that you were being let out  
15 under your contract with WCW?

16 A. My wife called me at WCW Power Plant during lunch  
17 hour. She got a letter in the mail FedEx. I said, open it  
18 up. I thought it was just a booking for when I wrestle.

19 She read the letter. She started crying on the  
20 phone. She said, they just fired you. You're at the Power  
21 Plant. You don't even know about it. She let me know. I  
22 didn't even know.

23 (Marked Defendants' Exhibit No. 8.)

24 BY MR. PONTZ:

25 Q. Let me hand you what's being marked as Defendants'

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1 Exhibit 8. Is this the letter you were speaking of?

2 A. My wife, like I said, she read it to me, sir.

3 Q. Did you ever see the letter afterwards?

4 A. No, sir.

5 Q. Look at, if you will, at Defendants' Exhibit 8  
6 with me. This appears to be a letter sent in October 5th,  
7 1999 to you by JJ Dillon, and it indicates that you're being  
8 terminated under independent contractor agreement. Is that  
9 roughly what you recall happening?

10 A. Yes, sir.

11 Q. Do you remember being paid through the end of  
12 October?

13 A. Yes, sir.

14 Q. Under your contract?

15 A. Yes, sir.

16 Q. But not after that?

17 A. Not after that, sir.

18 Q. You don't know who made the decision to terminate  
19 your contract with WCW, do you?

20 A. No, sir.

21 Q. And you don't know why somebody made that  
22 decision?

23 A. Do I know why, sir?

24 Q. Yeah.

25 A. I just think it was just out of bias and racism,

1 sir.

2 Q. But you don't know that? No one ever said that to  
3 you, right?

4 A. Excuse me, sir?

5 Q. No one ever said that to you, correct?

6 A. No, they never said it to my face, sir.

7 MR. PONTZ: Is it okay if we push on for a few  
8 more minutes and then we'll take a break for lunch?

9 MR. ICHTER: Sure.

10 MR. PONTZ: Are you okay to keep going for a few  
11 more minutes?

12 THE WITNESS: I'm fine. I'm fine.

13 MR. ICHTER: We have tremendous stamina on this  
14 side of the table.

15 MR. PONTZ: I doubt it.

16 MR. ICHTER: Low thresholds for boredom, but  
17 tremendous stamina.

18 BY MR. PONTZ:

19 Q. Mr. Norris --

20 A. Yes, sir.

21 Q. -- from the time that you had your first tryout  
22 with WCW back in '95, all the way through the time you  
23 signed your contract in April of 1999, that whole period  
24 before you were under contract, did you ever make any  
25 efforts to find any other wrestling opportunities with any

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1 other organization besides WCW?

2 A. Yes, sir.

3 Q. What organizations did you seek opportunities  
4 with?

5 A. I don't know if they really count at all. Is it  
6 Mid -- I want to say Mid -- is it Mid South, sir?

7 Q. Is that your recollection?

8 A. One was Mid South, sir, and the other one, of  
9 course, everybody like WWF if they can get in and so forth.

10 Q. Okay. Well, tell me about Mid South, what efforts  
11 did you make to find wrestling opportunities with them?

12 A. Well, actually, I think Mr. Hamilton had sent a  
13 couple of guys from school up there to actually go and  
14 wrestle up there. He said it would make us better.

15 And they have what you call local television up  
16 there, and I think the deal was made between Mr. Hamilton  
17 and the guy who actually doing the book up there said as  
18 long as you don't go out there and beat our guys up on TV  
19 and kill them off, then you can utilize our guys.

20 Q. So you got sent up to do some wrestling with Mid  
21 South?

22 A. I want to call it -- it's in Memphis. I don't  
23 know what the territory is called.

24 Q. But to some smaller promotion?

25 A. Yes, sir.

1 Q. And how many times did that happen; do you recall?

2 A. A few times. It didn't happen often because a lot  
3 of times, like I say, I didn't have guys willing to drive  
4 the six and a half hours up there, you know.

5 Q. When you did that, I assume you missed a day or  
6 two from the Power Plant?

7 A. No, it was on the weekends, sir.

8 Q. Okay.

9 A. They did their TV taping on Saturdays, sir.

10 Q. And do you remember some of other guys from the  
11 Power Plant you went up there to do that with?

12 A. No, sir. They wouldn't go.

13 Q. They wouldn't go?

14 A. They said it weren't worth it.

15 Q. Were you the only one who went up?

16 A. Yes, sir.

17 Q. So you went up by yourself?

18 A. Yes, sir.

19 Q. Okay. Mr. Hamilton picked you to do that?

20 A. No, sir. Actually, what I was asking Mr. Hamilton  
21 at the time was was there anything I need to do to improve,  
22 to get better and so forth. That's when I was trying to get  
23 on television.

24 And he said the only thing is the fact that  
25 because I was ready to go, raring to go but I didn't have



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1 what you call the TV exposure, you know. I'd never been on  
2 TV. At that level everybody is scared that you're going to  
3 get out there and freak out and do something crazy.

4 So I was trying to say, well, if I can get some  
5 exposure on television, would that speed up my process and  
6 get me in WCW on a contract. And he said sure, that should  
7 be the only thing holding you back. Well, he called me kid  
8 all the time.

9 Q. Kid?

10 A. Yeah, kiddo. Oh, kiddo, do what you need. You  
11 need the exposure.

12 Q. Okay. You didn't find that a derogatory term, did  
13 you?

14 A. Well, I did, but Mr. Hamilton is Mr. Hamilton.  
15 You know, he's like some other guys. Some of the guys just,  
16 you know, I mean, you ain't going to change certain guys.

17 Q. Did he call other young guys kid?

18 A. I'm pretty sure he did.

19 Q. White guys and African-American guys?

20 A. No, I think he pretty much called them guys pretty  
21 much by their name, you know, he called them, Rage or Kaos.

22 Q. Did you ever say anything to Mr. Hamilton that you  
23 didn't like kid or kiddo?

24 A. Well, you know, I always try to use the name  
25 Hardbody, but I think it's kind of like, you know, maybe

1 people thought it was like, this guy thinks he's a hard body  
2 or something, you know. I think some guys took it like an  
3 ego type deal versus just call the guy Hardbody, whatever.

4 VIDEOGRAPHER: Sorry to interrupt. I need to  
5 change the tape.

6 MR. ICHTER: As long as there's a break in the  
7 action --

8 MR. PONTZ: Let me just, if I can go about ten  
9 minutes, we'll get some real boring stuff out of the way.  
10 We'll take a break.

11 MR. ICHTER: Definitely.

12 (Whereupon, a discussion ensued off the record.)

13 BY MR. PONTZ:

14 Q. Mr. Norris, let me hand you another document --

15 A. Yes, sir.

16 Q. -- which I'm putting together now. Defendants'  
17 Exhibit 9.

18 (Marked Defendants' Exhibit No. 9.)

19 BY MR. PONTZ:

20 Q. Would you take a look at that for me.

21 A. Yes, sir.

22 Q. If you'll take a look at the first page of  
23 Defendants' Exhibit 9, this appears to be a 1099 Form for  
24 money you received from World Championship Wrestling in  
25 1997.

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1. A. Yes, sir.

2. Q. And it shows in excess of \$13,000.

3. A. Yes, sir.

4. Q. Is that your recollection roughly of how much you  
5 received from WCW during that year?

6. A. Yes, sir.

7. Q. And this was money you received for wrestling in  
8 wrestling events?

9. A. Yes, sir.

10. Q. And the following year 1998, or the following page  
11 there's a 1099 Form for WCW for 1998 for you, indicates an  
12 amount just shy of \$6,000, right?

13. A. Yes, sir.

14. Q. Again, you believe this is the amount you received  
15 for wrestling events with WCW?

16. A. Yes, sir.

17. Q. And then the next page is a 1099 for 1999 from  
18 World Championship Wrestling, and this indicates  
19 compensation to you just shy of \$21,000.

20. A. Yes, sir.

21. Q. Is that your recollection of how much you  
22 received?

23. A. Yes, sir.

24. Q. Okay. And this is all for wrestling  
25 opportunities?

1 A. Yes, sir.

2 Q. Okay. And then the next handful of pages just run  
3 through some payments to you, and if you'll take a look  
4 through those and tell me if there's anything in there that  
5 doesn't look like some checks you received from WCW for  
6 wrestling appearances or anything like that. Do those  
7 documents, the ones that look like these pages, look like --

8 A. Yes, sir.

9 Q. -- payments you received from WCW for wrestling  
10 appearances?

11 A. Yes, sir.

12 Q. And then the last two pages of this document  
13 appear to be additional payments made to you by WCW. Do  
14 these look more like the payments you received under your  
15 contract with WCW?

16 A. Yes, sir.

17 (Marked Defendants' Exhibit No. 10.)

18 BY MR. PONTZ:

19 Q. And let me put in the last document before we  
20 break for lunch. This will be Defendants' 10.

21 Mr. Norris, these are documents that were produced  
22 to us by your attorney.

23 A. Okay, sir.

24 Q. And they appear to be tax documents for you,  
25 individual tax returns.

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1. A. Okay.

2 Q. Okay. It appears to me that the first page of the  
3 first document is a tax return from 1996; is that right?

4 A. Yes, sir.

5 Q. Okay. And this is a joint return you received  
6 from -- that you filed with you and your wife?

7 A. Yes, sir.

8 Q. Okay. And did your wife work in 1996?

9 A. Yes, sir, she did, sir.

10 Q. Okay. And she earned wages someplace?

11 A. Excuse me, sir?

12 Q. She earned wages someplace in a job?

13 A. Yes, sir.

14 Q. Do you remember where she worked?

15 A. I'm trying to recall where she was at, sir. I  
16 can't recall right now, sir.

17 Q. Okay. Do you know in this -- on line seven where  
18 it indicates wages, is that your wife's wages or is that  
19 money you earned somewhere; do you know?

20 A. I can't remember, sir.

21 Q. Okay. That's fine. If you'll turn with me to --  
22 let me see here. Turn with me to the third page of that  
23 document. At the very bottom it should have a number that  
24 says P00330. Do you see that?

25 A. Yes, sir.

1 Q. Okay. This appears to be a profit or loss from  
2 business form for 1996. Is this a document, do you believe,  
3 that was filled out for money you made or lost as a wrestler  
4 or a boxer?

5 A. Yes, sir.

6 Q. Okay. And it indicates on here that you had  
7 \$4,600 and change in car and truck expenses.

8 A. Yes, sir.

9 Q. Is that travel costs getting to and from matches  
10 and things like that?

11 A. Not just matches. I did boxing events, as well,  
12 sir.

13 Q. Okay.

14 A. And what I did, I tied them both in together, sir.

15 Q. And you weren't reimbursed for these expenses --

16 A. Correct, sir.

17 Q. -- so you took them as a deduction on your taxes,  
18 right?

19 A. Yes, sir.

20 Q. And there's also an indication for \$1400 worth of  
21 meals. Were those meals incurred while you were traveling  
22 for different boxing and wrestling events?

23 A. Yes, sir.

24 Q. And you weren't reimbursed for those?

25 A. No, sir.

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1 Q. If you'll flip through with me to a bunch of pages  
2 forward, where is it? In the top right corner is a document  
3 that says Colorado Individual Tax Return, and it says  
4 P00336. Can you find that document for me? It's the little  
5 numbers up in the top right corner.

6 MR. ICHTER: That's it.

7 THE WITNESS: Okay.

8 BY MR. PONTZ:

9 Q. Are you able to find that document?

10 A. Yes, sir.

11 Q. Okay. Is this a document you filed to pay some  
12 tax returns in Colorado?

13 A. I'm pretty sure it is, yes, sir.

14 Q. Okay. How long did you live in Colorado in 1996;  
15 do you recall?

16 A. I don't recall, sir, at all.

17 Q. Okay. Did you move to Atlanta or the Kennesaw  
18 area, I guess, when you first started training with WCW?

19 A. Excuse me, sir. What I did was, I lived -- I was  
20 here, but my wife, she was in Colorado at the time, sir.

21 Q. Okay. When did she move?

22 A. I can't recall. I'd have to get the dates.

23 Q. Okay. That's fine. If you go forward with me a  
24 few more pages, you'll see a page marked down at the bottom  
25 as P00319. It's a profit or loss for business statement in

1 1997.

2 MR. ICHTER: That's it.

3 THE WITNESS: Okay.

4 BY MR. PONTZ:

5 Q. Do you see that form?

6 A. Yes, sir.

7 Q. And this indicates that some business, which I  
8 guess is Harrison Norris, Jr. Wrestling and Boxing, I don't  
9 know that that's a formal business but that's what it  
10 indicates on the document, had gross receipts or sales of  
11 1400 -- \$14,500.

12 A. Yes, sir.

13 Q. That money you made wrestling and boxing?

14 A. Yes, sir.

15 Q. Okay. And you had expenses for your car and your  
16 truck of \$8800, a little more than that?

17 A. Yes, sir.

18 Q. And advertising expenses, \$1600. What kind of  
19 advertising expenses do you recall having?

20 A. Did you say with the wrestling and the boxing?

21 Q. Yeah.

22 A. Well, certain things I have to do, like different  
23 from a boxing show than a wrestling show.

24 Q. Okay.

25 A. I've got a 1948 Plymouth coupe. A lot of time I



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1 haul it from arena to arena. I mean, you can't drive it.  
2 It's an old car with the original engine and so forth, so I  
3 have to pay a guy to haul it to get it there, or if it break  
4 down when I get it there or something like that, I have to  
5 get that thing fixed.

6 Q. That was part of your marketing efforts for your  
7 boxing and wrestling promotions?

8 A. Well, that's part of, you know, my main thing with  
9 the boxing, you know, creating this Tough Man image with  
10 this hard body looking car with the logos and the paint job  
11 and all and the paint and everything, with the names, and so  
12 forth. That's part of the boxing.

13 They never used the car in the WCW, but I use it  
14 with my smaller show, which helped me drew in fans.

15 Q. Okay. Great. And it shows from this document  
16 that your expenses in being a wrestler and a boxer  
17 outweighed the amount of money that you took in for receipts  
18 or sales, right?

19 A. Correct, sir.

20 Q. And on the next page there's an amount for special  
21 wardrobe, \$1600.

22 A. Yes, sir.

23 Q. Was that, at least in part, the wrestling uniforms  
24 and things you used?

25 A. Wrestling and boxing uniforms, sir.

1 Q. Okay. If you'll turn with me a few more pages to  
2 page P00342. It's up in the top right corner and it's an  
3 income tax declaration for electronic filing for 1998. Do  
4 you see that?

5 A. Did I pass it?

6 Q. It's P00342.

7 MR. ICHTER: Third to the last page.

8 THE WITNESS: Third to the last?

9 MR. ICHTER: Fourth to the last.

10 MR. PONTZ: Fourth to the last page.

11 THE WITNESS: Okay.

12 BY MR. PONTZ:

13 Q. Did you find that document?

14 A. Yes, sir.

15 Q. Okay. This indicates that you had -- you and your  
16 wife had total income in 1998 of 10,000, a little bit more;  
17 is that right?

18 A. I'm looking for it.

19 Q. I'm looking at line one.

20 A. Yes, sir.

21 Q. Okay. Did you file a tax return in 1998?

22 A. I can't remember, sir.

23 Q. We had requested as part of the discovery in your  
24 case tax returns for 1998 and 1999 and 2000, and have you  
25 filed your taxes for 2001 yet?

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1 A. No, I didn't, sir.

2 Q. Okay. Did you file taxes, tax returns in 1999 or  
3 2000?

4 A. I have to check with my wife on it, sir. She's in  
5 charge of all the paperwork.

6 Q. Okay. If I could ask you, we were not provided  
7 with any tax returns other than the ones you're seeing here.  
8 We were provided with '96 and '97 and only just this  
9 electronic filing form for 1998.

10 A. Okay, sir.

11 Q. If you would please take a look for tax returns  
12 for 1998, 1999, and 2000. If you find them, if you'd please  
13 provide them to your attorney.

14 A. Will do, sir.

15 Q. That would be great. And when you file your tax  
16 returns for 2001, will you let your attorney know and  
17 provide him with a copy, please?

18 A. Yes, sir.

19 Q. Great. Did you ever file any tax returns for any  
20 business that you ran other than your own personal tax  
21 returns?

22 A. I don't understand.

23 Q. Did you ever set up a corporation?

24 A. No, sir.

25 Q. Okay. Did you ever file any corporate taxes for

1 any business entity or anything like that?

2 A. No, sir.

3 Q. Were you ever involved in any tax filing for SCWA?

4 A. No, sir.

5 Q. Any other boxing or wrestling promotion or  
6 anything like that?

7 A. No, sir.

8 Q. Okay. So the only taxes you were aware of filing  
9 were personal income taxes?

10 A. Yes, sir.

11 Q. I think I asked you before about efforts you had  
12 made to find other wrestling opportunities, and you talked  
13 about sometimes you went up to Memphis to wrestle.

14 A. I didn't go up there a lot, sir.

15 Q. A couple times?

16 A. The only time I went up there when Mr. Hamilton  
17 said it was okay to go. If he didn't say it was okay to go,  
18 then I didn't go, because Memphis, Terry Taylor was tied  
19 into a fence network and the two companies went head to head  
20 as far as ratings, so that didn't look very favorable on  
21 anybody's part. We'd just go on your own, sir.

22 Q. But you did go a couple times just to get some  
23 practice, some ring experience?

24 A. I think I went maybe once, sir.

25 Q. Okay. And you mentioned contacting WWF. Did you

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1. contact WWF?

2           A.    I didn't talk to any -- what do you call it? --  
3 the bookers or nothing like that.

4           Q.    What did you do to find out about wrestling  
5 opportunities at WWF?

6           A.    Well, they're like WCW. They travel. When they  
7 get close to the area on a Saturday or a Sunday house show,  
8 you're going to make it. You try to go, you know, with the  
9 guys you're friends with that you get to meet, you go watch  
10 them wrestle, you like them and so forth.

11                   And they might say, hey, you know, I might pull  
12 some strings for you, get you up here, that kind of stuff.  
13 You never know.

14           Q.    This was just with wrestlers that you got friendly  
15 with or were there people --

16           A.    Yeah, just, you know, wrestlers.

17           Q.    Okay. Did you ever talk to anybody else besides  
18 wrestlers at WWF about getting an opportunity there?

19           A.    I talked to -- I don't know what position he hold  
20 now in the company because it's been some years back. I  
21 talked to -- what is the guy's name? I can't remember his  
22 name, but he was one of the guys that I think at the time  
23 worked with WWF organization.

24           Q.    Did you tell him you were interested in working  
25 with WWF, wrestling with them?

1           A.   Well, actually, I told him -- I just asked him  
2   what was the procedure that they got. I was just trying to  
3   find out what would be the procedures or the guidelines to  
4   get in WWF.

5           Q.   Do you remember what he told you?

6           A.   He just told me numerous things. I can't recall,  
7   but he told me numerous things.

8           Q.   Did you do anything to follow up on the thoughts  
9   he gave you, the information he gave you?

10          A.   No, I didn't, sir.

11          Q.   How come?

12          A.   Excuse me, sir?

13          Q.   How come?

14          A.   Time and they didn't come anywhere close probably  
15   for the next year and a half to where I was located at.

16          Q.   Did you ever write a letter to anybody at WWF  
17   saying I'd like a wrestling opportunity with you guys?

18          A.   Yes, I did.

19          Q.   Who did you write to?

20          A.   Vince McMahon.

21          Q.   Did you ever hear back?

22          A.   No, I didn't.

23          Q.   When was this letter?

24          A.   I can't recall, sir.

25          Q.   Did you ever write to anybody besides Mr. McMahon?

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1 MR. ICHTER: About wrestling for the WWF?

2 BY MR. PONTZ:

3 Q. About wrestling opportunities at WWF.

4 A. I remember a letter I remember addressing to  
5 Mr. McMahon. I don't recall any others.

6 Q. Okay. Did you ever contact a wrestling  
7 organization called ECW?

8 A. I talked to a couple of guys I know that wrestle  
9 at ECW. I went to company shows. I didn't too much care  
10 for their style.

11 Q. So you weren't real interested in finding  
12 wrestling opportunities with ECW?

13 A. Excuse me, sir?

14 Q. You weren't too interested in finding wrestling  
15 opportunities with ECW?

16 A. Well, it's not the case I wasn't interested in  
17 finding a wrestling opportunity, but I feel if I've got to  
18 bleed every match, then it's not worth my time.

19 Q. You didn't like the wrestling style?

20 A. No, sir.

21 Q. Any other organizations before you signed a  
22 contract with WCW that you remember contacting about  
23 wrestling opportunities?

24 A. That was it, sir.

25 Q. After your contract with WCW expired, you were let

1 go under your contract. We talked about that earlier.

2 A. Yes, sir.

3 Q. Did you contact any wrestling companies for  
4 opportunities to wrestle with them?

5 A. No, sir.

6 Q. So since you left WCW, you haven't contacted any  
7 other wrestling companies?

8 A. No, sir.

9 Q. How come?

10 A. Because I've been busy with Tough Man, sir.

11 Q. Okay. Do you know how much you earned in 2000  
12 Tough Man competition?

13 A. No, sir.

14 Q. Do you know how much you earned in 2001 Tough Man  
15 competition?

16 A. No, sir.

17 Q. Is it more than \$50,000?

18 A. Yes, it is, sir.

19 Q. In 2000?

20 A. I'm not sure about 2000.

21 Q. 2001 more than \$50,000?

22 A. Yes. Yes, sir.

23 Q. More than \$100,000?

24 A. I don't know, sir. I'm not sure.

25 Q. Do you think it might be?



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1 A. I don't know, sir. I'm not sure.

2 Q. And your wife handles the taxes?

3 A. Yes, sir.

4 Q. So you think your tax documents would show how  
5 much you made for 2001?

6 A. Yes, sir.

7 MR. PONTZ: Well, we're going to reserve the right  
8 to ask Mr. Norris some more questions once we get those tax  
9 documents, if necessary.

10 THE WITNESS: No problem, sir.

11 MR. PONTZ: Great. Lunch okay with everybody?

12 MR. ICHTER: Sure.

13 MR. PONTZ: Why don't we go off the record.

14 (Whereupon, a lunch recess was taken from 12:21 to  
15 1:20 p.m.)

16 BY MR. PONTZ:

17 Q. Mr. Norris, ask you a few more questions. Would  
18 you describe -- well, let me back up.

19 You understand that in kind of the wrestling  
20 parlance there were the normal, quote-unquote, heavyweight  
21 wrestlers who had a normal, traditional style of  
22 professional wrestling, and there were some lighter weight  
23 guys often referred to as cruiserweights who had kind of a  
24 more high flying or more work off the ropes and in the air  
25 and things like that? Is that your understanding of

1 professional wrestling when you were involved with it?

2 A. No, not really, sir.

3 Q. Okay. Do you remember there being some lighter  
4 wrestlers --

5 A. Yes.

6 Q. -- who had kind of different moves than some of  
7 the bigger wrestlers?

8 A. Yes.

9 Q. Did you consider yourself more like those lighter  
10 wrestlers who had the high-flying moves or more like the  
11 bigger wrestlers who had the strength and power moves and  
12 things like that?

13 A. Sir, both. I considered myself both.

14 Q. Did you wrestle both kinds of wrestlers?

15 A. Yes, I did, sir.

16 Q. Okay. You think you were able to wrestle the guys  
17 who were much bigger and heavier than you?

18 A. Yes, I did, sir.

19 Q. And did you feel like you could do the high-flying  
20 moves that some of the smaller guys did?

21 A. Yes, sir.

22 Q. Did you do a lot of aerial maneuvers and things  
23 off the ropes and things like that?

24 A. I could do, sir.

25 Q. Hmm?

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1           A.    I could but I was never given the opportunity to  
2   do those things, sir.

3           Q.    Did you do those things in practice and things  
4   like that?

5           A.    Yes, sir, we did, sir.

6           Q.    But in the wrestling matches you wrestled more of  
7   a traditional power, strength kind of wrestler rather than  
8   the high-flying moves; is that what you're telling me?

9           A.    No, sir. .I put some of everything in it. It all  
10   depends on the guy you were wrestling and what they will let  
11   you do.

12                   Remember, I was the one that was told to go out  
13   and, you know, pretty much lose, not to go out and win or,  
14   you know, make a guy look bad or outshine the guy. I was  
15   pretty much, say, go out and, you know, do what the guy  
16   expected you to do for you to make him look good.

17                   MR. PONTZ: Okay. Let me ask you about another  
18   document. This will be marked as Defendants' Exhibit 11.

19                   (Marked Defendants' Exhibit No. 11.)

20   BY MR. PONTZ:

21           Q.    Let me hand you what's been marked Defendants'  
22   Exhibit 11. This is an equal employment opportunity policy.  
23   Did you ever see this policy while you were out with WCW?

24           A.    No, sir.

25           Q.    Were you aware that WCW had policies against race

1 discrimination and harassment and things like that?

2 A. No, sir.

3 Q. Okay. Did you participate in a diversity workshop  
4 WCW provided to its talent in 1999?

5 A. I don't recall, sir. I don't remember, actually.

6 Q. You don't know whether you did or not?

7 A. No, sir, I don't remember.

8 Q. Do you remember hearing about some kind of  
9 diversity workshop going on with WCW in 1999?

10 A. No, sir. Most things that they use, they use  
11 their top level guys for. Like I say, more than likely we  
12 spent all our time at the Power Plant, sir.

13 Q. Okay. But you don't know whether there was a  
14 diversity training session done for all talent of all types?  
15 You don't recall whether that was done or not?

16 A. I don't know, sir.

17 Q. Okay. Let me ask you some questions, which is  
18 what I've been doing all day, but I understand from your  
19 complaint that you have a number of different types of  
20 discrimination claims out of what you claim did or didn't  
21 happen to you with WCW, and I want to ask you about some of  
22 those things, okay?

23 A. Yes, sir.

24 Q. Okay. Now, I take it you're not claiming that you  
25 didn't ever get a contract with WCW because of your race,

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1 right? Because you did get a contract with them in April of  
2 1999, right?

3 A. Yes, sir, I did.

4 Q. Okay. Are you claiming that you were ever denied  
5 a contract because of your race?

6 A. Yes, sir.

7 Q. When do you believe you were denied a contract  
8 because of your race?

9 A. After my training was completed, sir.

10 Q. So you think you should have gotten a contract in  
11 1996 after you completed your training?

12 A. Yes, sir.

13 Q. Okay. Do you know who made the decision not to  
14 give you a contract at that time?

15 A. No, sir, I don't.

16 Q. You don't know why the decision was made to not  
17 give you a contract at that time?

18 A. No, sir, I do not.

19 Q. Why do you believe then that you were not given a  
20 contract at that point because of your race? What evidence  
21 do you have that supports that belief?

22 A. Evidence I have to support it, because at the same  
23 time still was down at the training, camp training school,  
24 sir, and I was still training guys that were coming in.  
25 They was like leap frogging past me. I mean, it was crazy.

1           Q.   Who were some of the guys that you believe got  
2   contracts that you believe you should have gotten contracts  
3   over them?

4           A.   It's not a case of who were the guys.  It's just  
5   the fact that, like I say, I was there and I did my training  
6   and I feel that if the company did not want to have anything  
7   to do with me as far as giving me a contract, then they  
8   should have sat us down and counseled right there on the  
9   spot.

10           I mean, I put a lot of years of my life and my  
11   wife life on hold waiting in line down there.

12           Q.   So you think it was discriminatory that they  
13   didn't sit you down after six months and say you're not  
14   going to have a future here, and because they let you  
15   continue to train and work with WCW, that was  
16   discriminatory?

17           A.   No, sir.  That's not --

18           Q.   What are you saying then?

19           A.   What I'm saying is -- what I'm saying is, we was  
20   told to be there.  Even after six months we was told, you  
21   need to be here.  This is the time you need to be here.

22           Everything they told me to do, I was there.  If  
23   they tell me to be there at 9:00, I was there at 9:00.  If  
24   they told me 8:00, I was there at 8:00.  If they would have  
25   told me I couldn't go home at 5:00, I was there till 5:00.

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1 I didn't complain. I didn't, you know, moan. I did what I  
2 was told to do.

3 And in return I was expecting, you know, for me to  
4 get, you know, a WCW, you know, a contract, you know, in  
5 return or, you know, just decent courtesy to say, okay,  
6 then, guy, you're not going to cut the mustard, go do  
7 something else.

8 Q. Okay. So you're upset that they didn't either  
9 give you a contract or tell you to go?

10 A. No, sir. I'm not upset at all. It's just the  
11 fact that, like I say, I was still at the training school  
12 after my six months. I'm training guys. I mean, you know,  
13 I was in guys in the ring with, you know, a lot of guys that  
14 I helped --

15 Q. Okay.

16 A. -- you know, get to the level of being from a no  
17 wrestler to a wrestler, and I watched them same guys leap  
18 frog past me and get contracts.

19 Q. Is it possible that the people who were making  
20 decisions on giving out contracts felt like those people  
21 turned out to be better, more interesting wrestling  
22 characters than you were?

23 MR. ICHTER: I'm going to object to the question  
24 in that it calls for this witness to speculate as to what  
25 other people knew or thought or believed.

1

2 BY MR. PONTZ:

3 Q. Okay. You can answer the question, Mr. Norris,  
4 and I'll repeat it if you'd like.

5 MR. ICHTER: If you know.

6 BY MR. PONTZ:

7 Q. If you know. Isn't it possible that the people in  
8 creative talent, the people making decisions about giving  
9 contracts, felt that some of these other wrestlers were more  
10 talented than you or would have made better WCW wrestlers  
11 than you?

12 MR. ICHTER: Same objection. Go ahead.

13 BY MR. PONTZ:

14 Q. Go ahead and answer.

15 A. Sir, I don't know what creative talent, what was  
16 their guidelines. I don't know. The only thing I know, I  
17 was told to be somewhere, I was there. I was told to do  
18 something, I was there. I was told to help train these  
19 guys, I helped train them.

20 And the same return of me helping train them guys,  
21 they got jobs and contracts because of my talent of me  
22 helping them. Without me helping them and my talent of  
23 putting forth the effort of being there every day for them,  
24 to have a guy to throw around the ring or show them how to  
25 do things, they would never have a contract or a job.



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1 Q. You don't know if there were Caucasian wrestlers,  
2 non-African-American wrestlers who spent lots of years down  
3 at the Power Plant who never got a contract, do you?

4 A. Yes, I do know, sir.

5 Q. There are some who never got a contract, right?

6 A. It's been a lot of years. The only guy who -- the  
7 only African-American been down there longer than I was was  
8 Tony Carr, but like I said, he's only the one I know of.

9 Q. But you don't know if there were white wrestlers  
10 who were down there the kind of years, two, three, four  
11 years like you were who didn't get a contract with WCW? Do  
12 you know whether that's true or not?

13 A. Yes, sir, I do.

14 Q. Is it true or not?

15 A. Any white guy that was down there any length of  
16 time, they got a contract.

17 Q. How do you know that?

18 A. Because, I mean, I watched them all come through  
19 the door. I helped train these guys. That's how I know  
20 that. I was in the ring with these guys.

21 Q. Did you ever see the contracts they got?

22 A. Excuse me?

23 Q. Did you ever see the contracts they got?

24 A. Well, sir, they never went away. I know they was  
25 there and they was getting paid and they was on television,

1 so I know for a fact that money had to be changing hands  
2 somewhere down the line.

3 Q. Right, but you were working for years and getting  
4 paid when you didn't have a contract. Isn't it possible  
5 they didn't have contracts either?

6 A. No, it's not possible, sir.

7 Q. Why is that not possible?

8 A. Because most guys when they came in, especially a  
9 lot of the white guys, when they came in, they got a  
10 contract, they bragged about it. It's one of them type, I  
11 got one and you don't got one, you know.

12 Q. Is it possible they were lying about it?

13 A. Excuse me?

14 Q. Is it possible they were lying about it?

15 A. There's no way they could have been lying about  
16 it, sir.

17 Q. Why? People don't brag about things that aren't  
18 true?

19 A. Well, because they were using men on -- putting on  
20 Nitro and they were being put on pay-per-views, and at that  
21 level you just don't get it because you don't have a  
22 contract. You get it because you got one.

23 Q. That's your belief?

24 A. Excuse me, sir?

25 Q. That's your belief?

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1. A. Facts, sir.

2. Q. You don't know who got a contract and who didn't  
3 get a contract with WCW; isn't that true?

4. A. No, sir, that's not true.

5. Q. You know every single person that got a contract  
6 with WCW?

7. A. No, sir, I do not. No, sir, I do not know every  
8 single person that has a contract.

9. Q. Okay.

10. A. We're talking about the guys that came through the  
11 Power Plant, sir. That's what we are talking about.

12. Q. You know every single person who came through the  
13 Power Plant whether they got a contract or not?

14. A. If they came through the Power Plant, any  
15 longevity of time, you know, as far as naming names, I'm  
16 going to tell you yes, he got one, no, he didn't get one  
17 because I was there every day, sir.

18. Q. Well, you tell me. Who is it that you think got a  
19 contract that you should have gotten one instead of? Is  
20 there somebody you can think of who you think you should  
21 have got a contract instead of?

22. A. You're asking me is there guys that got contracts  
23 that I should have got a contract before them?

24. Q. Yeah.

25. A. Or the guys that got contracts, that I should have

1 had one and they not had one?

2 Q. Either way. Start with the people who you think  
3 you should have gotten a contract instead of them.

4 A. Okay. It's not a fact that I think I should have  
5 got a contract instead of somebody else, because everybody  
6 work ability is totally different. And like I say, I'm not  
7 creative control to say who get one, who don't get one.

8 But the only thing I'm saying is if I bust my  
9 chops just as hard as the next guy, then I deserve mine, as  
10 well.

11 Q. But isn't it more than just how hard you work?  
12 Isn't it the character that you are, and some characters  
13 work and some characters don't?

14 A. Yes, sir, it is the character that you are and the  
15 character, but the character never get over unless the  
16 character get a chance to get over.

17 Q. Well, you wrestled numerous times on these  
18 matches, didn't you?

19 A. I wrestled numerous times, but I also was  
20 instructed and told what to do and what not to do. It  
21 wasn't like we say, Hardbody, go out there and win this  
22 match, or Hardbody, go out there and take 80 percent of this  
23 match and get yourself over. It wasn't ever about that.  
24 It's about Hardbody, you're losing this match.

25 If the guy only gave you 5 percent of the match,

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1 then that's all you've got. You get anymore, then you have  
2 to go see the bookers or anybody else, you didn't get on  
3 television or any wrestling match. That's just the way it  
4 worked.

5 Q. Who did you talk to about getting more  
6 opportunities within the wrestling matches?

7 A. Terry Taylor and JJ Dillon.

8 Q. Anybody besides Mr. Dillon and Mr. Taylor?

9 A. I talked to the instructors, but like I say, it's  
10 nothing they can do about it. It's out of their hands.

11 Q. Okay. When did you talk to Mr. Taylor?

12 A. I talked to Mr. Taylor just as soon as, like I  
13 say, we was doing matches on television, you know, what we  
14 call squash matches. I don't know if you understand the  
15 concept or not.

16 Q. That's a match where one of the wrestlers gets  
17 beat by the other wrestler pretty badly, right?

18 A. Correct, sir.

19 Q. Okay. And what did you talk to Mr. Taylor about  
20 in terms of getting more wrestling opportunities?

21 A. Well, I just told him I'd, you know, like to, you  
22 know, venture out, and, you know, and really case, you know,  
23 my talent. And instead of, you know, he case my talent, he  
24 did totally opposite.

25 I mean, he put me in literally matches just to get

1     squashed, and I think it was all reference of not just out  
2     of just plain bias, racism, but out of the fact it's because  
3     I did come to him and ask him, hey, is there anything, you  
4     know, positive I can get out of this, and, you know,  
5     squashing the guy is not getting anything positive out of  
6     it.

7             Q.     But you don't know why he chose to put you in  
8     that -- those kinds of matches?

9             A.     Out of racism. That's why he chose to do it.

10            Q.     Why do you say that?

11            A.     Because, you know, it's the way he had me lose and  
12     the guys he had me lose to.

13            Q.     So that's your feeling of the way the matches went  
14     and who they were against?

15            A.     Correct. Well, it's not the way I feel the match,  
16     sir. It's the fact that what I got out of the match. If I  
17     went to -- if he had me book with a guy and the guy only  
18     gave me 3 percent or 5 percent of the match, then I know it  
19     was something coming straight from the booker. It's not  
20     coming from the guy. It's coming from the bookers saying  
21     this is what I want. I want you to go out and not give him  
22     anything in the match, and I want you to, you know, have  
23     95 percent of the match. Do not give him a chance to get  
24     over.

25            Q.     Mr. Taylor never said to you, hey, Mr. Norris, the

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1 reason I'm using you this way is because of your race?

2 A. No, he did not.

3 Q. Mr. Dillon that you had conversations with, what  
4 did Mr. Dillon tell you when you asked about wrestling  
5 opportunities?

6 A. About wrestling opportunity, he just pretty much  
7 told me I'd get my opportunity and I'd get my chance. He  
8 pretty much told me to go see Terry Taylor.

9 Q. Okay. Do you think Mr. Dillon discriminated  
10 you -- against you on the basis of your race?

11 A. Yes, I do.

12 Q. And in what way? What did he do that  
13 discriminated against you?

14 A. Because he was in a position of power where he  
15 could say, okay, then, let's see what this kid really got.  
16 Let's put him out there, at least give him a 50/50 match and  
17 see can he hold his own, and that opportunity for Hardbody  
18 never got a chance to occur.

19 Q. So you think because he didn't make a push happen  
20 or make more opportunities for it to happen, that was  
21 discriminatory?

22 A. It's not a case where he -- it's not a case where  
23 I'm looking for Mr. Dillinger to give me a push. It's just  
24 the case say, well, you know, get a talented guy, we got it  
25 because of him, you should need to at least get one match in

1 to see what he's capable of doing.

2 Q. Do you know what Mr. Dillon thought of your  
3 talent?

4 A. No, I do not.

5 Q. Do you believe Mr. Dillon did anything else to you  
6 on the basis of your race other than not giving you the  
7 opportunity that you wanted?

8 A. Well, like I say, I never know, sir, who's in  
9 charge as far as, like you said, giving the contract or the  
10 financial fee of the contract, but Mr. Dillinger know, just  
11 like everybody else know in WCW, my capabilities are as far  
12 as me holding my own in a match and leading a match or doing  
13 whatever I need to do, because when they got a lot of young  
14 guys -- when I say new guy, I want to say young guys -- I  
15 was usually the one chosen to go put these guys, you know,  
16 over on television.

17 Why? Because I was -- one, because I was black;  
18 two, because I was a good wrestler; and three, because I  
19 made whoever the white guy was look good on television.

20 Q. Okay. Mr. Norris, let me make sure I'm perfectly  
21 clear. There's a gentleman at WCW you're aware of named JJ  
22 Dillon, right?

23 A. Yes, sir.

24 Q. Is there a different gentleman whose name is Doug  
25 Dillinger?



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1 A. Yes, it is.

2 Q. They're different people?

3 A. Yes, they are, sir.

4 Q. Okay. And when you were just talking to me, you  
5 were talking about JJ Dillon?

6 A. JJ Dillon is one of the -- I think he's one of the  
7 bookers.

8 Q. Okay.

9 A. Or one of the creative control.

10 Q. And Mr. Dillinger didn't have anything to do with  
11 that area?

12 A. Mr. Dillinger, as far as I know, I think he was  
13 head of security, sir.

14 Q. Okay. Because for a second I thought you referred  
15 to Mr. Dillinger or Dillinger and I just wanted to make  
16 clear.

17 A. No, sir.

18 Q. Okay. Thank you. I appreciate that.

19 Other than -- you just spoke about Mr. Taylor and  
20 Mr. Dillon. Is there anybody else at WCW you believe  
21 discriminated against you on the basis of your race?

22 A. Yeah, I mean, you know, there's several  
23 individuals I feel that was very just, you know,  
24 discriminatory against my race as far as at WCW. I mean --

25 Q. Who were those people?

1           A.    I would feel that, you know, I mean, Eric used to  
2   be in charge of the company. I mean, he would have  
3   knowledge and control of a guy, whether you're a new guy or  
4   old guy that comes in the company.

5           Q.    This is Eric Bischoff?

6           A.    Correct.

7           Q.    Do you believe Mr. Bischoff discriminated against  
8   you on the basis of your race?

9           A.    Yes, I do.

10          Q.    What do you think Mr. Bischoff did that  
11   discriminated against you on the basis of your race?

12          A.    Well, like I said, sir, by him being in the  
13   position of vice president and by him not going down on a  
14   regular basis and seeing the talent that he had at the Power  
15   Plant, I mean, as far as the guys that, you know, we did and  
16   we performed down there and helped train the guys and so  
17   forth. I mean, we bust our chops for the company, you know,  
18   and like I said, we just never was given the opportunity.

19          Q.    Okay. Aren't there white wrestlers at the Power  
20   Plant who didn't get an opportunity, in their opinion? They  
21   feel like they didn't get a good look from Eric?

22               MR. ICHTER: I'm going to object to that to the  
23   extent that it calls for him to tell you what the opinions  
24   of other -- what Caucasian wrestlers or he can tell you what  
25   he was told, but he can't tell you what they thought.

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1 MR. PONTZ: Can we go off the record real fast.

2 (Whereupon, a discussion ensued off the record.)

3 BY MR. PONTZ:

4 Q. Mr. Norris, we were talking about Mr. Eric  
5 Bischoff and you explained to me in part, at least, what you  
6 think Mr. Bischoff did to you that you believe was race  
7 discrimination. Okay.

8 My question is, are you aware of whether there  
9 were any white wrestlers at the Power Plant who expressed to  
10 you that they didn't feel like they were getting fair  
11 opportunities to appear and show what they could do?

12 A. No, usually white wrestler didn't come around and  
13 talk to me about their personal lives or their business at  
14 the Power Plant.

15 Q. So you don't know what those guys were thinking or  
16 weren't thinking?

17 A. No, sir.

18 Q. What else do you believe Mr. Bischoff did that  
19 discriminated against you on the basis of your race, other  
20 than what you just testified to?

21 A. Well, I'm pretty sure Mr. Bischoff had my history  
22 as far as my background and as far as my championships and  
23 different things and weight lifting and Tough Man and boxing  
24 skills and so forth.

25 And actually, I'm pretty sure he knew all the

1 things that I was capable of doing and all the tournaments  
2 and stuff that I had won, so for him to know that stuff and  
3 not use it in a positive way to help the company, I really  
4 thought was really discriminatory against me, not only, you  
5 know, as a black but as a good talent wrestler.

6 Q. And assuming that he had that knowledge, you don't  
7 know why he made the decision not to use you more than you  
8 were used at WCW, correct?

9 A. Correct, sir.

10 Q. Anything else that you believe Mr. Bischoff did  
11 that discriminated against you on the basis of your race  
12 other than what you've already testified to?

13 A. Well, once again, sir, I don't know, like I say,  
14 who was the authorizing signatures as far as monies or  
15 allocated money for contracts, but at the time Mr. Bischoff  
16 was the vice president, I'm pretty sure somebody had to sign  
17 off on it. I'm pretty sure it had to be his signature or  
18 the signature of somebody that brought it to the attention,  
19 say, okay, we're only going to pay Hardbody X amount, this  
20 and that.

21 When I came to WCW, I hadn't already had 12 to 13  
22 Tough Man titles under my belt, and I can name three or four  
23 other wrestlers that haven't even one thing to that  
24 magnitude with different states and titles and things of  
25 that nature and were paid a whole lot more than I was paid

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1 and it's not fair.

2 Q. You don't have any idea what Mr. Bischoff or other  
3 people at WCW thought of Tough Man competitions in terms of  
4 how it would work or not work in a particular wrestling  
5 character, do you?

6 A. No, sir, I do not know what Mr. Bischoff think  
7 about Tough Man at all, sir.

8 Q. Okay. In addition to Mr. Taylor and Mr. Dillon  
9 and Mr. Bischoff, is there anybody else who you believe  
10 discriminated against you on the basis of your race at WCW?

11 A. At this time I can't really think of any other  
12 guys because, like I said, the instructors really weren't  
13 put in a position to make me or break my career. The guys  
14 who were put in that position was the guys that so far we've  
15 been talking about.

16 Q. Do you think that the instructors discriminated  
17 against you on the basis of your race?

18 A. Sometimes they did, but like I said, once again,  
19 it was one of them type deals like, well, you got to work  
20 with these guys every day. Some stuff you had to, you know,  
21 bite the bullet on, sir.

22 Q. And when you talk about the instructors  
23 discriminating against you, are you talking about in the way  
24 that they treated you at the Power Plant?

25 A. Correct, sir.

1 Q. Like the moving rings and the cleaning up and  
2 things like that?

3 A. Well, not just moving ring. Like I said, sir, I  
4 mean, it's like in other detail. I don't mind helping out  
5 and doing my share, but once the other guys supposed to be  
6 there doing the same thing at my same level, when I got  
7 seniority-ship over all of them and they're not doing it,  
8 I've got a problem with that.

9 Q. So you think they should have asked some wrestlers  
10 who weren't participating in, to participate in those  
11 activities?

12 A. It's not a case, sir, I think they should have  
13 asked. It's a case I think they should have made them do it  
14 like everybody else done, sir.

15 Q. And that was Mr. Bruce and Mr. Wenner and  
16 Mr. Whatley? Were those the trainers down at the Power  
17 Plant?

18 A. Yes, sir, it was trainer, and Jody Hamilton was  
19 the overseer of that, sir.

20 Q. Okay. So those are the four individuals you  
21 believe should have told other people to help out?

22 A. Well, it's the case they should have made them,  
23 you know, participate and did their share and make sure they  
24 was there.

25 Q. All right. Do you believe there was anything

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1 discriminatory about the contract you did get in April 1999?

2 A. Yes, sir.

3 Q. What do you believe was discriminatory about that  
4 contract?

5 A. I feel that -- I don't know how much of as far as  
6 the contract you understand about it, but I feel the  
7 marketing and merchandise, I feel that, you know, they  
8 should have, you know, actually could have did -- once  
9 again, could have did something with the marketing and  
10 merchandise on not only myself, but several other black  
11 wrestlers down at the WCW Power Plant.

12 Q. Okay.

13 A. And the amount of the contract, I feel that was  
14 very, very, you know, discriminatory. But like I said  
15 earlier, sir, I wasn't in no position to bargain.

16 Q. Well, other than I think you testified you could  
17 have turned it down and walked away from WCW, right?

18 A. Yes, sir, but you've got to look at my thing, too.  
19 I mean, I had to move my family here from Colorado. That's  
20 almost a \$5,000 move. Relocated them. She quit her job and  
21 came here. We found a house and stuff here. I mean, that's  
22 a lot of money invested. That's withholding nothing from  
23 the table, sir.

24 Q. Okay.

25 A. I mean, if we're just talking about six months,

1 maybe I could understand it, but you're talking about years.

2 Q. Well, when did you first think you were being  
3 denied opportunities on the basis of your race?

4 A. When it first start? Actually, first couple of  
5 months when I actually got into the training center, because  
6 once again, I was there every day, so I seen the cleanup,  
7 the same old who pushing the broom, who not, what guys  
8 saying that he ain't going to dump no f-ing trash or  
9 whatever, that kind of stuff.

10 Q. Did you complain about what you thought was  
11 discrimination to anybody?

12 A. Well, it wasn't a case that we complained. It's a  
13 case that we brung it to the instructor that was in charge  
14 attention, but they didn't fix it, what were we supposed to  
15 do?

16 Q. Okay. Whose attention did you bring it to then?

17 A. I brung it to all the instructors' attention.

18 Q. And what did they say about it?

19 A. Once again, it's one of them type deals, don't  
20 make waves. You know, don't do this, don't do that, so to  
21 speak.

22 And then, I mean, it boils down to the point  
23 where, like I said earlier, they said be here at

24 9:00 o'clock in the morning, I was there at 9:00 o'clock in  
25 the morning. Certain guys never abide by that, and the guys



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1 that never abide by that, it was white wrestler that came in  
2 when they want to come in.

3 Q. Do you remember who any of those wrestlers were  
4 that stand out in your mind as people who didn't abide by  
5 what you believed you were being told you had to do?

6 A. Do I remember? Yes, I remember several of them.

7 Q. Who were they?

8 A. Lorenzo. I can't remember his last name.

9 Lorenzo, Johnny Attitude, Johnny Swinger, Luther Biggs. I  
10 want to say wrestling name is Rage, Rob or -- I can't think  
11 of his last name, Robbie Rage was his wrestling name. Kenny  
12 Kaos. Ron Reese.

13 Q. Do you remember his wrestling name?

14 A. Ron Stud, Big Ron Stud.

15 Q. Anybody else you can think of?

16 A. Them guys right now are the only ones I can  
17 remember right off the top of my head.

18 Q. And these are all white guys?

19 A. Yes, they are. I mean --

20 Q. Okay. I think you had told me earlier, am I  
21 correct, that when you got a contract coming out of the  
22 Power Plant to the trainee contract, there were both some  
23 minorities and some whites who got contracts like that?  
24 That was what you understood what happened?

25 A. Yes, sir.

1 Q. Okay. And you understood that there were some  
2 whites and minorities who didn't get a contract and were  
3 told they couldn't train at the Power Plant anymore?

4 A. I don't know what they was told, but I'm pretty  
5 sure they phase them out or did away with them.

6 Q. Okay. Did you ever complain to anyone at WCW  
7 about not receiving a contract anytime before April of 1999?

8 A. Yes, I talked to -- I didn't complain, but I  
9 talked to, once again, the instructor. They make you use  
10 like sort of what you call a chain of command. I went  
11 through them to talk to the bookers.

12 And once again, I tried to book appointment to see  
13 Eric, but like I say, every time I go to see Eric, I usually  
14 had to see either JJ or Terry Taylor, and they was -- pretty  
15 much was the messenger of the bad news.

16 Q. And what did they tell you when you say the bad  
17 news?

18 A. Well, it was just different things saying, well,  
19 you know, either they sent me to the other guy, which it  
20 took me two or three more days or two or three more weeks to  
21 catch up with them because they were busy or they were  
22 taping somewhere or they couldn't see me today or, you know,  
23 that type of nature, versus walk right in and see them like  
24 an open door policy type of deal.

25 Q. Okay. In none of those meetings, no one ever said

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1 to you you're not getting a contract because of your race?

2 A. No, sir.

3 Q. And after you received your contract in April, did  
4 you complain about the terms of it or how it was being --  
5 how you were being used under the contract to anybody?

6 A. I asked the instructors about the terms and they  
7 just say, oh, that's just a thing you start out with like  
8 that and then things from there get better.

9 Q. Did you talk to anybody else about the terms of  
10 the contract or how you were used under the contract?

11 A. I mentioned it to Mr. Terry Taylor once again.

12 Q. What did you say to Mr. Taylor?

13 A. I asked him about it and he just said, once again,  
14 he said, either you sign the damn thing or you don't.

15 Q. And you don't know what conversations he may have  
16 had with other trainees about their contracts or anything  
17 like that?

18 A. No, sir.

19 Q. And I think you told me earlier you didn't know  
20 who made the decision to terminate your contract in October  
21 of 1999?

22 A. No, sir.

23 Q. Is there anything else about your claims of  
24 discrimination in how your contract was that we haven't  
25 talked about? Any other evidence or support for your claims

1 that you were discriminated against in contracts that we  
2 haven't already talked about?

3 A. Well, most of it, like I said, what we went over  
4 and we covered it, but the only part, like I say, we didn't  
5 cover is, like I said, the big box of tapes you're looking  
6 at.

7 Like I told you, sir, earlier, I was at the Power  
8 Plant every day. That's the footage. I took my own video  
9 camera down there every day, so for a guy saying, well, he  
10 wasn't there, then they're going to look at how many years  
11 I'm down there right there in the box.

12 Q. Did you ever offer those tapes to anybody at WCW  
13 to look at?

14 A. Yes, we did. Mike Wenner, one of the instructors,  
15 we did go over the tapes a lot because it's one of the type  
16 things, if I'm going to do something in the ring, I want to  
17 make sure I'm doing it right. If I wasn't doing it right, I  
18 want to stay there until I get it right and fix it.

19 Q. So you worked with Mike Wenner to help him  
20 review -- help -- have him help you review the tapes to  
21 critique your performance?

22 A. Yes, I did.

23 Q. Did you ever offer the tapes to anybody else at  
24 WCW to say, here, look at the work I've been doing?

25 A. Yes, we did. We showed some of the tapes to some

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1 other guys to help other guys get matches on television.

2 Q. Okay. Who is "we", Mr. Norris?

3 A. I showed them to Jody Hamilton.

4 Q. No, no, no, no. You said "we" offered the tapes.

5 A. Me, Pez Whatley, Dwayne Bruce, you know, we  
6 offered any tapes to see how well a guy worked because --

7 Q. Okay. I'm sorry. Who did you show them to then?

8 A. Well, once again, we had to go up the chain of  
9 command, sir. We had to first go through Jody Hamilton  
10 because he was in charge of the school.

11 Q. Okay. Did Jody say you could go talk to other  
12 people and show them the tapes?

13 A. Well, usually what he do, he say, well, you know,  
14 because they didn't let us run around the office. It's one  
15 of them type deals it was like off limits for us to go up  
16 there.

17 It was try to call and get in touch with one of  
18 the bookers and say, hey, can we get a day when you guys can  
19 come down and look at a tape.

20 They might came down and look at maybe one match  
21 or two match, but usually when they did, once again, it came  
22 right down to discriminate thing, they took all the white  
23 guys, all the black guys again, you know, and it just got to  
24 the point where it was just getting sickening, you know.

25 Q. Who do you believe, other than -- you're talking

1 about Mr. Taylor and Mr. Dillon and Mr. Bischoff again?

2 A. Correct. Well --

3 Q. Are there any other individuals you believe came  
4 down to the Power Plant to look at people and took only  
5 white guys?

6 A. Well, you know, I've got several tapes over there  
7 where actually that's where they came down to look at a  
8 group of guys and said, okay, they were going to do  
9 something with these group of guys. But once again, if you  
10 look at the group of guys that they chose, you know, it was  
11 all white guys.

12 Q. Do you know who made that choice?

13 A. No, sir, I don't.

14 Q. Anything else of what we talked about -- other  
15 than what we've talked about that you believe is part of  
16 your claim that you were discriminated against in the  
17 contracts you did or didn't receive with WCW, or have we  
18 talked about everything that goes to that claim?

19 A. Well, once again, I think we mentioned earlier, we  
20 hit on it earlier about the marketing, merchandising  
21 structure of it.

22 It was like I asked Mr. Taylor about that also.  
23 You know, I mean, when I got there I was like -- I can't  
24 remember what year it was I asked. I said, Mr. Taylor, I  
25 was like why don't, you know, you guys have any black guys

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1 on the T-shirts, you know. And he's kind of like, well, why  
2 would you ask something like that. I mean, he just looked  
3 at me like I was way out in space or something.

4 I'd say, well, you know, it's a market out there  
5 for it, you know. I mean, the company is southern based in  
6 Atlanta, which is a good area that you can draw and build  
7 from if you've got a good top guy that you can build with,  
8 but it's just one of the things that got, once again, swept  
9 under the carpet and he didn't want to talk about.

10 Q. Do you know if Mr. Taylor was in charge of making  
11 marketing decisions or whose faces showed up on T-shirts?

12 A. I don't know, sir. I don't know who's in charge  
13 of that.

14 Q. Now, your complaint also talks about  
15 discrimination in wrestling opportunities or promotions, or  
16 I think the word that they used is getting a push. Is that  
17 a phrase you're familiar with?

18 A. Yes, sir, I am, sir.

19 Q. And that means getting wrestling opportunities so  
20 that you try to get over with the crowd; is that right?

21 A. Yes, sir.

22 Q. Okay. Are you claiming that you were denied  
23 wrestling opportunities or denied a push on the basis of  
24 your race?

25 A. Yes, I was, sir.

1 Q. Okay. Who do you believe denied you those  
2 opportunities?

3 A. The bookers at the time, which was -- I'm pretty  
4 sure was Terry Taylor and JJ Dillon.

5 Q. Okay. Anybody else you believe denied you a push  
6 or wrestling opportunities?

7 A. Eric Bischoff.

8 Q. Okay. How about Mr. Sullivan, Kevin Sullivan, did  
9 he deny you any opportunities on the basis of your race, do  
10 you believe?

11 A. Well, I don't think Mr. Sullivan ever denied me on  
12 the basis of my race, because a lot of times if I did have a  
13 problem, if he was around, because, like I say, once again,  
14 we weren't allowed to be in the office, so if he was around,  
15 Kevin, I need more matches, you know, I've got to feed my  
16 family. And I mean, I lost all the matches, but at least I  
17 was getting booked.

18 Q. So you think he didn't discriminate against you on  
19 the basis of your race?

20 A. Correct.

21 Q. Are there white wrestlers that you believe got  
22 pushes, got wrestling opportunities that you believe you  
23 should have been given?

24 A. Yes.

25 Q. Who would those white wrestlers be?



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1           A.    Let's see.  Johnny Attitude.  Johnny Swinger.  A  
2   guy named Michael something.  He was Canadian.  Young kid.

3           Q.    Michael something.  You don't know his last name?

4           A.    I can't remember his last name.  I've got him on  
5   tape.  I'm pretty sure if I watch the tape I can get his  
6   name, sir.

7                   Lorenzo.  You know, guys of that nature, you know,  
8   at the Power Plant.  Ron Stud.  I mean, you know, just  
9   different guys just came in and they were given opportunity  
10  to win and get a gimmick and try to get it over.  Luther  
11  Biggs.  He was another one, you know.

12                   MR. ICHTER:  Can I ask you something?  Did you ask  
13  him just to limit that to people who came through the Power  
14  Plant?

15                   MR. PONTZ:  No.

16                   MR. ICHTER:  Okay.

17  BY MR. PONTZ:

18           Q.    Mr. Norris, and that's a good point by your  
19  attorney.  Are there other wrestlers, even ones who didn't  
20  come through the Power Plant, who believed you -- who you  
21  believe got a push that should have been given to you or  
22  that you were more qualified for for a push?

23           A.    Sure.  I mean, you got guys like -- I'm not  
24  knocking him.  He's a good guy and a good wrestler, like  
25  Disco Inferno, you know, Glacier, you know, Kris Kanyon.

1 You've got guys like that, Robbie Rage or Raging Chaos.

2 High Voltage was the wrestling name.

3 Q. You think you should have been given wrestling  
4 opportunities instead of them?

5 A. Sure. I mean -- I mean, I had more athletic  
6 skills or just as much, and then I had more what you call --  
7 what they call it in wrestling? You promote yourself. I'm  
8 trying to think. It's not self-promotion. What do you call  
9 it?

10 I'll probably say charismatic attitude, you know.  
11 I mean, a lot of them guys, when they gave them a push, they  
12 got on television and they locked up. They got scared.  
13 They missed what you call spots, you know, where you're  
14 doing something in the ring, you know.

15 And from the first time from go when I got in the  
16 ring, you know, I hit my spots and did what I had to do to  
17 get the crowd over. And I was versatile, you know.

18 For the company to be able to, you know, take a  
19 guy that didn't have no wrestling background or experience  
20 and put him -- what I mean by versatile is I wrestle both as  
21 a good guy on television and as a bad guy.

22 A lot of them guys couldn't do that. They try  
23 them at that, you know, and a lot of them didn't fork out  
24 the time and the effort to go out, you know, and pay good  
25 money for their outfits and things of that nature. I mean,

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1 I tried to put it all in perspective where I can help WCW  
2 draw in the crowd and make money.

3 Q. Okay. But you don't know who made the decisions  
4 to take guys like Disco Inferno and Glacier and Canyon and  
5 use them in wrestling instead of you?

6 A. I'm pretty sure it was creative control or bookers  
7 or whoever the top notch guys was.

8 Q. Okay. But you don't know exactly who those people  
9 were?

10 A. No, sir, I don't, sir.

11 Q. And other than JJ and Terry Taylor, did you talk  
12 to anybody about getting a push or getting more  
13 opportunities other than anybody you've testified about?

14 A. I talked to the instructors and that's about it,  
15 sir.

16 Q. Did you ever hear anything that made you believe  
17 that some of the bookers thought you had a negative attitude  
18 or that you clashed with other wrestlers?

19 A. No, sir, I didn't.

20 Q. Your complaint makes a reference to the tag team  
21 known as Harlem Heat. Do you know who Harlem Heat is?

22 A. Yes, sir, I do, sir.

23 Q. Who are the wrestlers that have the tag team  
24 nickname Harlem Heat?

25 A. Booker T, Stevie Ray, sir.

1 Q. Okay. Did you find the name Harlem Heat  
2 discriminatory?

3 A. Yes, it was, sir.

4 Q. Okay. Do you know who came up with that name?

5 A. No, sir.

6 Q. Do you know whether Booker T and Stevie Ray came  
7 up with it?

8 A. I don't know, sir.

9 Q. Did you ever ask them if they came up with it or  
10 not?

11 A. No, sir, I didn't.

12 Q. Your complaint refers to people being directed --  
13 African-American wrestlers being directed to act as a pimp  
14 by WCW.

15 A. We talked about that earlier, sir.

16 Q. That was the Jimmy Hart idea?

17 A. Yes, sir.

18 Q. Okay. But no one ever actually sent you out for a  
19 match to act like a pimp?

20 A. Well, actually, I was at one of the Nitros. I was  
21 getting ready to go out, and I think creative control or  
22 whoever it was said no, don't do it because it might be ugly  
23 on us tomorrow morning in the national newspaper or  
24 something of that nature, sir.

25 Q. Okay. Anyone ever send you out or ask you to

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1 portray a savage?

2 A. No, sir.

3 Q. Okay. Anyone ever ask you to portray an Uncle

4 Tom?

5 A. No, sir.

6 Q. Anyone ever ask you to portray any other character

7 that you thought was a negative stereotype for an

8 African-American?

9 A. No, sir.

10 Q. Did anyone ever tell you that your character

11 Hardbody wasn't getting a push because it wasn't a negative

12 stereotype?

13 A. No, sir.

14 Q. And no one ever said if you acted like a lazy

15 character you'd get a push, did they?

16 A. No, sir.

17 Q. No one ever said if you acted stupid you'd get a

18 push, did they?

19 A. No, sir.

20 Q. And no one ever said if you acted like a criminal

21 character you'd get a push, did they?

22 A. No, sir.

23 Q. Have we talked about everybody that you talked to

24 about wrestling opportunities and trying to get more

25 wrestling opportunities? Is there anybody else you can

1 think of you talked to about trying to get more wrestling  
2 opportunities?

3 A. Not at this time, sir.

4 Q. Is there anything else about your claims about not  
5 getting wrestling opportunities that we haven't talked about  
6 already today?

7 A. Well, I think one of the things we haven't  
8 mentioned was the guidelines when I came to the training  
9 school. What they told me the guidelines was to get into  
10 wrestling or to be accepted back in school was physical fit,  
11 you know, your charisma, your look, being able to work, your  
12 flexibility, and all the things they do in the ring as far  
13 as agility.

14 And everything we did in the ring, you know, as  
15 far as hands on, I aced everything, and on my evaluation,  
16 you know, I got what you call 100 percent on. So I never  
17 blew one of those things.

18 So for me not to be, like I said, sitting around  
19 after six months not doing anything with the company or the  
20 company not using me to help make the company money, I felt  
21 it was very derogatory as far as me as far as discrimination  
22 because, like I say, everything they asked me to do, I did.  
23 If they told me to be there at certain time, I was.

24 I mean, I spent ten and a half years in the  
25 military and I'm being -- used to being told. I was a

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1 leader. I was an NCO in the military. So I mean, being  
2 where I'm supposed to be on time and doing what I'm supposed  
3 to do, I'm used to that.

4 So when I left, like I said, in '94 from Colorado  
5 come here, I was just transitioned out of the military into  
6 this, so it wasn't no long period of time like I went, you  
7 know, buggish and not listening to my superiors.

8 Q. You understand that part of wrestling is acting in  
9 the character and the persona, right?

10 A. All of wrestling is acting.

11 Q. Okay. And so that's not an exact science. It's  
12 not a matter of who's the strongest or who's the biggest.  
13 Sometimes that doesn't matter, right? It's the character or  
14 the persona?

15 A. It's who they like, who they want to push, and  
16 what color your skin is. That's the way it's going to be in  
17 wrestling.

18 Q. That's your opinion of what happened to you,  
19 right?

20 A. No, sir. That's the opinion of what happened to  
21 everybody. I mean, look at the numbers speak for itself.  
22 WCW, I mean, look at the percentage of white wrestler versus  
23 black wrestlers.

24 Q. Do you have any idea what percentage of the group  
25 of people who came to WCW for an opportunity were white

1       versus black?

2           A.    No, sir.

3           Q.    And were they mostly white?  Most the people you  
4   saw coming to the Power Plant were white?

5           A.    No, sir.  I seen just as many guys try out black  
6   as white guys, but they was, like I said, how do you call  
7   it?  They was eliminated, so to speak.

8           Q.    Do you know why they were eliminated?

9           A.    I would just say, you know, as far as race basis.

10          Q.    But you don't know if maybe they weren't as  
11   qualified as the people who were accepted?

12          A.    Sir, I've been down there, like I say, a long  
13   time.  I've seen guys coming there with 23, 24-inch arms --

14          Q.    Right.

15          A.    -- with 60-inch chests --

16          Q.    Right.

17          A.    -- that should have been on television making, I  
18   mean, mega stars out of them.

19          Q.    But it's more than just their physical look,  
20   right?

21          A.    Correct, sir.

22          Q.    They have to be able to carry out a match, right?

23          A.    Correct, sir.

24          Q.    And carry out a story?

25          A.    How can they carry out a match or a story if they



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1 never get an opportunity to?

2 Q. I understand, but if someone makes the judgment  
3 that they don't believe that person has the talent to carry  
4 it out, what they look like won't matter, right?

5 A. Correct, sir.

6 Q. So if you look at someone and say this guy's eight  
7 foot two and 500 pounds, but I don't think he can go from  
8 one move to the other without forgetting what his name is,  
9 that would be a problem, right?

10 A. Yes, sir, it would be a problem.

11 Q. Okay. And they might be wrong about that  
12 evaluation, but if that's the evaluation they make, it would  
13 be hard for them to put them on TV, right?

14 A. Yes, it would.

15 Q. Okay. Is there anything else that we haven't  
16 discussed about your claims that you were not given  
17 opportunities to wrestle because of your race or not given a  
18 push because of your race other than what we've already  
19 talked about?

20 A. Some of the pay-per-view footage that we did like  
21 the commercials on, we actually did commercial for the  
22 pay-per-views, and a lot of time, depending on who's in the  
23 pay-per-view or who was getting the push, it was Dallas  
24 Page, well, you know, you guys, we'll miss you, got to get,  
25 you know, rewarded for this and try to get you guys some

1 better matches on television and so forth. You know, things  
2 like that get promised to you and then all of a sudden when  
3 you come back around to it, like, we forgot about him.

4 Q. This was other wrestlers promising you  
5 opportunities?

6 A. Well, I mean, they really didn't have the books,  
7 but they kind of like was friends with the guys with books.  
8 You know, that happened a lot, too.

9 Q. So they said they'd try to get you an opportunity?

10 A. Well, try to get you a word in or get you an  
11 opportunity, or, you know, that sort of thing.

12 Q. But you don't know why that actually didn't  
13 happen, do you?

14 A. No, sir.

15 Q. Anything else you can think of about opportunities  
16 to wrestle or opportunities for a push that you didn't get  
17 that you believe was because of your race other than what  
18 we've talked about?

19 A. Well, mainly, like I said, just -- I just feel it  
20 was very discriminatory because race ethnic versus anything  
21 else, because as far as the criteria, I met all the  
22 criteria, as far as being there on a daily basis. I was the  
23 lower puppy.

24 And as far as getting nothing out of it in return,  
25 I can say absolutely I got pretty much not worth out of

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1 return for what I have done for them.

2 Q. Anything other than that that we've already talked  
3 about? Have we talked about everything that you believe  
4 supports your claim that you didn't get opportunities or a  
5 push because of your race?

6 A. With the exception of just the tapes and that's  
7 it, sir.

8 Q. And we'll review those tapes at some point. We'll  
9 talk about that.

10 MR. ICHTER: Can we take a break at this point?

11 MR. PONTZ: Sure. Let's go off the record and  
12 take a break.

13 (Whereupon, a brief recess was taken.)

14 BY MR. PONTZ:

15 Q. Mr. Norris, let me ask you about your claims that  
16 you were discriminated against in your pay. Okay. You  
17 understand part of your complaint is that you -- there was  
18 discrimination in the amount you were paid by WCW?

19 A. Yes, sir.

20 Q. Okay. Are you talking about the pay that you  
21 received when you wrestled for WCW before you were under  
22 contract or the pay you received under your contract, or are  
23 we talking about both?

24 A. We're talking about both, sir.

25 Q. Okay. What is it that you believe was

1 discriminatory about the pay you received when you appeared  
2 in wrestling matches before you were under contract?

3 A. Sir, before I was on contract with WCW, the  
4 average white guy started out 200, 250 a match. The average  
5 black guy started out at a hundred to 150 a match.

6 Q. Okay. Why do you think that?

7 A. Excuse me, sir?

8 Q. Why do you think that?

9 A. Once again, people talk. They talk in the locker  
10 rooms and that's how the word get out.

11 Q. Okay. Did you ever see that in any documentation,  
12 that white wrestlers who were making similar appearances to  
13 you were paid more than you were?

14 A. Well, sir, once again, the only thing I can tell  
15 you is, you know, what I was told as far as the wrestlers in  
16 the locker rooms or the wrestler at the Power Plant.

17 Q. Okay. Other than other wrestlers telling you the  
18 rumor that whites were paid more than blacks, is there any  
19 other evidence that supports your claim that you were paid  
20 less?

21 A. Sure.

22 Q. What else?

23 A. Bankers.

24 Q. Excuse me?

25 A. The bank, when people went to the bank, you know,

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1 they have like little truck come around or they had -- what  
2 you call it? -- like a little deal on a truck, and they got,  
3 well, I've got to run by the bank and cash my check or  
4 something like that. They run by the bank and so forth and  
5 cash their check.

6 Q. And why do you believe that proves that you were  
7 discriminated against on the basis of your pay?

8 A. Because, once again, you know, it shows  
9 discriminatory as far as the white wrestler versus the black  
10 wrestlers because the black wrestler getting paid a whole  
11 lot less.

12 Q. Well, I'm not sure how it shows that. Tell me why  
13 you think --

14 A. Okay. When I first got to WCW, okay, they told me  
15 \$150 per match, okay. Of course I agreed because I wanted,  
16 you know, to get in and, you know, just do a good job.

17 But come to find out, one of the guys who was my  
18 roommate down from Florida, he was getting 200, 250 a match.

19 Q. Who was that?

20 A. Johnny Swinger.

21 Q. How long had Johnny Swinger been wrestling?

22 A. Not longer than I have.

23 Q. Not longer than you had?

24 A. No, sir.

25 Q. When did he come to the Power Plant?

1           A.    He didn't come to the Power Plant. He was one of  
2   the guys who leap frogged over me and got a contract before  
3   me.

4           Q.    So he was paid a different amount under his  
5   contract?

6           A.    No, no, sir. We're talking about before he got a  
7   contract.

8           Q.    Okay.

9           A.    You know, the independent contract pay, if he did  
10   a match, they paid you for it. They actually gave him a job  
11   before they gave me a job.

12          Q.    And is there something that makes you think that  
13   he was paid more per job than you were paid?

14          A.    He told me.

15          Q.    Okay. Anything other than him telling you that?

16          A.    I mean, I didn't see no documentation black or  
17   white, other than I'm going to take his word for it.

18          Q.    Anybody else besides Mr. Swinger who you believe  
19   was paid more than you per match before you were under  
20   contract?

21          A.    I'm pretty sure a lot of guys name that were on  
22   that list that I gave you, same way.

23          Q.    Okay. You think so but you're not sure?

24          A.    Not so, sir. They bragged about it. I mean, guys  
25   ain't got no reason to brag about something if it ain't

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1 true. If a guy is going to brag, he's only going to brag  
2 about what's true.

3 Q. Other than other wrestlers telling you what they  
4 made or what they believed other people made, did you ever  
5 have anybody else ever tell you what people made as far as  
6 per event non-contract pay?

7 A. Are you talking about like a booker or an  
8 instructor?

9 Q. Anybody other than wrestlers.

10 A. Just every now and then one of the instructor  
11 might joke on somebody and say, oh, this guy is overpaid,  
12 but it was like in a joking sense.

13 Q. Okay.

14 MR. ICHTER: Evan, since you're on the subject, I  
15 wanted to ask you about something and I don't want to  
16 forget, if you want to go off video.

17 In any event, I was noticing that Defendants'  
18 Exhibit No. 3 is sequentially Bate stamped, but it is  
19 extracts from a document that appears to be hundreds of  
20 pages long that reflect what all the different wrestlers are  
21 being paid, including those folks who aren't apparently  
22 under contract, and I don't believe that we have an entire  
23 copy of this document.

24 So on the record I just wanted to indicate to you  
25 that we would appreciate it if we could get a copy, since

1 clearly WCW thinks this line of inquiry is relevant. That's  
2 all.

3 MR. PONTZ: Okay. All righty.

4 MR. ICHTER: Do you think we can get that?

5 MR. PONTZ: I have no idea, but I will certainly  
6 look into it.

7 MR. ICHTER: I appreciate that.

8 BY MR. PONTZ:

9 Q. Mr. Norris, all right. We were talking about the  
10 pay that you received per match. Is your belief that you  
11 were paid less than whites limited to the time -- you  
12 remember that we talked about at some point you started  
13 getting 300 or \$350 a match?

14 A. Yes, sir.

15 Q. Do you believe you were still being discriminated  
16 against on the basis of pay compared to non-contract white  
17 wrestlers after you started getting 300 a match or was it  
18 just --

19 A. Yes, still, because they might have got bumped up  
20 also.

21 Q. Do you know whether they did or not?

22 A. Yes, they did.

23 Q. How do you know that?

24 A. They told me.

25 Q. What did they get bumped up to, according to them?



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1 A. Different figures.

2 Q. What wrestlers told you they got bumped up to  
3 higher amounts?

4 A. Like I say, I was like roommate one of the trips  
5 down in Orlando with Johnny Swinger. First time we went  
6 down we pretty much just, you know, mellow out and so forth.

7 And then when we came back, they put him on a  
8 permanent deal, permanent contract, and but come to find  
9 out, wow, well, congratulations. I mean, I congratulated  
10 the guy, but come to find out, the whole time he's down in  
11 Florida, he's still making almost \$150 more than I was  
12 making.

13 Q. That's what he told you?

14 A. Yes.

15 Q. And you don't know who made the decision on how  
16 much to pay you or --

17 A. No, sir, I don't.

18 Q. -- anybody else?

19 A. No, sir, I don't.

20 Q. And --

21 A. You know.

22 Q. You've answered my question. I appreciate that.

23 A. You asked me a two-part question. I couldn't  
24 remember the first half you asked me. You asked me  
25 something else. You said something about contracts and then

1 you came back and asked me about on contract and then not on  
2 contract.

3 Q. Yeah. Right now I just want to ask you about  
4 before you were on contract.

5 A. Okay.

6 Q. And you told me so far that you believe you were  
7 discriminated against on the basis of your pay both when you  
8 were making \$150 and then after you got a bump up, right?

9 A. Right.

10 Q. Okay. But you don't know who made the pay  
11 decisions?

12 A. No, sir, I don't.

13 Q. Okay. Did you ever complain to anybody about how  
14 much you were being paid per appearance?

15 A. I didn't complain, sir. I brung it to somebody's  
16 attention.

17 Q. Whose attention did you bring it to?

18 A. Once again, chain of command.

19 Q. Well, who was it?

20 A. I went to the instructor first. After they  
21 notified Mr. Hamilton, I went to Mr. Hamilton. He notified  
22 the bookers and tried to get us an appointment and so forth.

23 Q. Okay. Is this before you went from 150 to 300?

24 A. Yes.

25 Q. And do you believe that the raise to 300 was in